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ABSTRACT

Hearings on the U.S. system of accrediting colleges are presented, with attention to the relationship between accreditation and the eligibility system of the Department of Education. Colleges approved by accrediting agencies become eligible to participate in federal financial aid programs, while schools that do not follow accrediting agency standards lose their eligibility for assistance. The Department has criteria and procedures to determine which national, regional, and specialized accrediting agencies should be included on its list of recognized agencies. Accreditation is largely a means of conducting nongovernmental, peer evaluation of educational institutions or programs. Cases are cited in which accrediting agencies have used their status to advance certain ends of special interest groups. It is noted that some accredited colleges have a loan default rate of 85 percent. Some representatives of higher education organizations advocate nongovernmental, voluntary institutional accreditation as the best mechanism to establish eligibility for federal funds. Enclosed materials include copies of a pamphlet on the governing board's role in accreditation and a booklet on strengthening quality in colleges. (SW)

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HEARINGS ON INSTITUTIONAL ACCREDITATION

ED247807

HEARINGS

BEFORE THE

SUBCOMMITTEE ON POSTSECONDARY EDUCATION

OF THE

COMMITTEE ON EDUCATION AND LABOR HOUSE OF REPRESENTATIVES

NINETY-EIGHTH CONGRESS

FIRST SESSION

HEARINGS HELD IN WASHINGTON, D.C.,
FEBRUARY 8, 10, 1983

Printed for the use of the Committee on Education and Labor

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CONTENTS

Hearings held in Washington, D.C.: Page
February 8, 1983 1
February 10, 1983 91
Statement of—
Ambach, Gordon M., president, University of the State of New York and Commissioner of Education, State of New York 92
Bell, Hon. Terrel H., Secretary of Education; accompanied by Edward Elmendorf, Assistant Secretary for Postsecondary Education; and Richard J. Rowe, Director, Eligibility and Agency Evaluation Staff 2
Boyer, Ernest L., president, Carnegie Foundation for the Advancement of Teaching 23
Manning, Thurston E., director Commission on Institutions of Higher Education 135
Millard, Richard, executive director, the Council on Postsecondary Accreditation 70
Peltason, Jack, president, American Council on Education 39
Phillips, James M., executive director, accrediting commission, Association of Independent Colleges and Schools, accompanied by Robert Kline, chairman; and William C. Clohan, Jr., general counsel 152
Sweet, Gordon W., executive director, Commission on Colleges of the Southern Association of Colleges and Schools, accompanied by Joffre T. Whisenton, associate executive secretary, Commission on Colleges; and Thomas Carpenter, president, Memphis State University 113
Prepared statements, letters, supplemental materials, etc.:
Ambach, Gordon M., president, the University of the State of New York, and commissioner of education:
Letter to Chairman Simon, dated March 10, 1983, enclosing response to questions 110
Prepared statement of 96
Questions for Dr. Gordon Ambach 109
Bell, Hon. T. H., Secretary of Education:
Answers to questions from Secretary Bell 21
Prepared statement of 6
Boyer, Ernest L., president, the Carnegie Foundation for the Advancement of Teaching, prepared statement of 27
Manning, Thurston, E., director, Commission on Institutions of Higher Education North Central Association of Colleges and Schools:
Letter to Chairman Simon, dated March 2, 1983, enclosing responses to questions 195
Prepared statement of 139
Millard, Richard, director, the Council on Postsecondary Accreditation:
Executive summary of testimony 71
Prepared statement of 73
Peltason, J. W., president, American Council on Education:
Letter to Chairman Simon, dated March 3, 1983, enclosing responses to questions 186
Prepared statement of 41
"The Board's Role in Accreditation," pamphlet entitled 45
"To Strengthen Quality in Higher Education" summary, booklet entitled 53
Phillips, James M., executive director, Accrediting Commission, Association of Independent Colleges and Schools:
Letter to Chairman Simon, dated March 7, 1983, enclosing responses to questions 200

Page

Prepared statements, letters, supplemental materials, etc.—Continued
Phillips, James M., executive director, Accrediting Commission, Association of Independent Colleges and Schools—Continued
Memo to AICS accredited institutions and interested parties, subject, interim approved policy guidelines for institutional grant and loan programs 178
Memo to AICS member institutions, subject, revised accrediting criteria 168
Prepared statement of 156
"Procedures and Guidelines for Senior Collegiate Institutions Offering Education at the Graduate Level," article entitled 176
Simon, Hon. Paul, a Representative in Congress from the State of Illinois and chairman, Subcommittee on Postsecondary Education:
Opening statement of, February 8, 1983 1
Opening statement of, February 10, 1983 91
Sweet, Gordon W., executive director, Commission on Colleges of the Southern Association of Colleges and Schools:
Letter to Chairman Simon, dated March 4, 1983, enclosing responses to questions 190
Prepared statement of 117
Woosley, Hugh A., administrator for Accrediting Bureau of Health Education Schools, letter to Chairman Simon, dated February 21, 1983 204

HEARINGS ON INSTITUTIONAL ACCREDITATION

TUESDAY, FEBRUARY 8, 1983

HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON POSTSECONDARY EDUCATION,
COMMITTEE ON EDUCATION AND LABOR,
Washington, D.C.

The subcommittee met, pursuant to call, at 9:40 a.m., in room 2261, Rayburn House Office Building, Hon. Paul Simon (chairman of the subcommittee) presiding.

Members present: Representatives Simon, Kogovsek, Owens, Coleman, Gunderson, Petri, and Packard.

Staff present: William A. Blakey, majority counsel; Maryln L. McAdam, majority legislative assistant; and John Dean, assistant minority counsel.

Mr. SIMON. The subcommittee will come to order.

I will enter a statement in the record on the accreditation problem. We have a situation, if I may describe it very briefly, where the Federal Government, in fact, accredits the accrediting agencies and the accrediting agencies are coming up with all kinds of very minute details that sometimes have something to do with the quality of education, and sometimes have nothing to do with the quality of education.

Colleges and universities and other institutions feel compelled, in part because of the Federal leverage here, to do what these accrediting agencies require.

I have no specific sense of what we ought to be doing. That is why we have the wisdom of the witnesses today who can guide us. Perhaps there is nothing we should be doing in the way of legislation. Maybe it is simply a problem that we ought to recognize and which we can solve administratively.

In any event, there is no better way to start than to have the Secretary of Education appear before us, and we are pleased to welcome you once again, Mr. Secretary.

[The opening statement of Congressman Paul Simon follows:]

OPENING STATEMENT OF HON. PAUL SIMON, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF ILLINOIS AND CHAIRMAN, SUBCOMMITTEE ON POSTSECONDARY EDUCATION

The Subcommittee on Postsecondary Education begins today two days of hearings on the subject of institutional accreditation. Institutional accreditation is very important to most of us, but in many ways misunderstood. For example, no parent would send their child to a college or university that was not accredited, nor to an elementary or secondary school that did not receive the approval of whatever certifying or accrediting agency was responsible for determining the quality of the education offered by the particular school. What in fact, we have done is to equate "accreditation" with "quality". In most instances that is appropriate where the school,

college or university establishes or maintains a standard of quality—a standard of quality that you or I would accept.

Institutional accreditation at the postsecondary level today, does not subscribe to a universally accepted standard, nor does it pretend to. A standard of quality varies from institution to institution and from region to region within the 50 states. Not since 1905, when the Carnegie Foundation for the Advancement of Teaching first published a series of criteria for determining institutional participation in the Foundation's pension fund for faculty, has the academic community and the public been more concerned about the issues of quality in higher education as we are today. Those criteria provided a simple yardstick for measuring each postsecondary institution.

An admission requirement of four years of preparatory or secondary school study;
A minimum of, at least, six full-time professors;
A four-year course in the arts and sciences;
A productive endowment of at least $200,000.

I dare say that we have today some schools or colleges that we call "postsecondary institutions" that might not meet those standards. The North Central Association, which was first organized in Evanston, Illinois in March of 1895, may have been on the right track in 1909 when it published explicit standards for higher education institutions in its region. Again the factors to be measured were simple and general: (1) a student had to have 120 hours to graduate; (2) the course work undertaken and completed had to be acceptable at recognized graduate schools for purposes of pursuing an advanced degree; (3) a specific level of endowment was set forth or tax support necessary to maintain the institution's educational program; (4) library and laboratory equipment had to be "sufficient"; and (5) the construction and maintenance of buildings had to ensure "hygenic conditions". Many of the regional associations still seek to maintain high standards and I applaud them for their tremendous efforts. However, too little is being done to that end and too much "* * * to encourage, to stimulate and to evaluate" according to an institution's own standards. Accreditation is often a result of "low aim" on the part of an institution, rather than high achievement by the trustees, administration, faculty and students. Accrediting bodies should not perpetuate the "low aim" approach, but should demand more from the institution.

Self-regulation is essential to the independence and to the survival of higher education. I believe that the Carnegie Foundation report—which we will discuss today—has provided some excellent grist for a discussion that is long overdue in the higher education community.

Importantly, from the Subcommittee's viewpoint, the expenditure of billions of dollars in Federal funds is directly tied to the fact that an institution must be accredited. Since the major portion of these funds are portable grants and loans to eligible students—and institutional accreditation is inseparably connected to access to large amounts of student aid funds—it is our responsibility to ensure that these funds are well-spent.

I look forward to hearing from our witnesses on these and other issues. We are pleased to welcome the Secretary of Education, who has seen this issue from several points of view—as Commissioner of Education, as the top higher education official in Utah and now as Secretary of Education. Welcome, Mr. Secretary.

STATEMENT OF HON. TERREL H. BELL, SECRETARY OF EDUCATION, ACCOMPANIED BY EDWARD ELMENDORF, ASSISTANT SECRETARY FOR POSTSECONDARY EDUCATION; AND RICHARD J. ROWE, DIRECTOR, ELIGIBILITY AND AGENCY EVALUATION STAFF

Secretary BELL. Thank you, Mr. Chairman.

If it is all right with you, I will summarize my testimony and submit it for the record.

Mr. SIMON. Fine.

Secretary BELL. That way I may not risk telling you more than you want to know on this subject.

Mr. SIMON. Your full statement will be entered in the record.

Secretary BELL. The Higher Education Act of 1965, amended authorizes a number of higher education programs to support institutions and to support students in postsecondary education.

The funding of these programs has grown until now we are in the realm of $7 billion, at least it was there the past fiscal year. In order for those institutions and their students to participate in these programs, Congress has set institutional eligibility requirements.

There are five of them, and the most prominent one and the one around which I know the chairman called this meeting, is the requirement that the institution must be accredited. It is because of this connection between eligibility and the accreditation requirement that Federal funds are involved.

The accreditation system in our country is a peer-evaluation type of program. We have developed a system of relying on the decisions of accrediting associations, regional, State, and some of them in specialized areas that are nationwide in their scope. It is out of this system that this eligibility is established and as we recognize the accrediting associations, we try to appraise their meeting the requirements that we feel that Congress intended that there be reasonable standards of quality and that the students attending those institutions will be receiving instruction that is reasonably commensural with what we would be expecting in our society.

We conducted a study of the effectiveness of our procedure for approving these accrediting agencies. The Educational Testing Service of Princeton, N.J., had the contract to evaluate the procedure that we have to see if it reliably differentiated between effective agencies and those that were not effective in seeing that these standards were met.

This study, the report given in May 1980, indicated that the procedures that were being followed in the Department did reliably differentiate between ineffective and effective accrediting agencies.

It is important to emphasize, as you indicated, Mr. Chairman, that we do not accredit institutions, we recognize agencies that are reliable authorities for accreditation and we think that our procedure for recognition has been validated by the study that I just referred to.

Institutions that fail to adhere to the standards that are set by their accrediting bodies lose their eligibility for Federal financial assistance. In my testimony, I go into a little detail of the history of accreditation. It has been in existence since the late 1980's and became much more prominent in the early 1900's.

We have specialized types of accrediting bodies like those for law and medicine, and MBA programs are accredited by the national organization that accredits collegiate schools and business. Then we have general type of entities, regional organizations that accredit an entire institution.

I might point out, Mr. Chairman, that we publish a list of the nationally recognized accrediting bodies which is periodically published in the Federal Register. This procedure has been in existence now for about 30 years and there are 15 different pieces of legislation that we have identified, I will not go into them, that require accreditation standing in order to participate.

There are also 40 separate statutory references to the Secretary's list of approved agencies. They involve the programs, not only of the Department of Education, but a total of 10 Federal agencies, other departments and independent agencies in the Government.

I might indicate that there are alternatives to accreditation and the qualifying steps for that. An institution can be approved if they can be certified by three other fully accredited institutions. These institutions certify that the institution's credits will be accepted on the same basis as credits accepted from fully accredited institutions.

There is more detail in it, but this is an alternative approach. One of the problems faced by a newly established institution is to qualify and to have a means of participation in this.

We currently recognize 47 organizations as reliable accrediting bodies and as indicated in my testimony, there are 77 components of those 47 organizations. This includes some 13 commissions that are units of the 6 regional associations and then there are 64 other bodies of national scope that can be identified or characterized as institutional, specialized, or a combination of those 2 types of organizations.

Some State education agencies have approval, the New York State Board of Regents is the oldest of that group, and they have been designated by the Secretary as a nationally recognized accrediting body.

We should emphasize that the commissions of the regional associations and the national accrediting agencies and associations do not have legal control over these institutions or the programs. They do not have governing status, but the method of peer evaluation of these educational institutions where a group of visiting experts are selected by the accrediting body to visit the campus and to review materials that are reported and so on. This is involved in a voluntary procedure of accreditation.

Most of the personnel that serve on these accrediting bodies, and most of us who have worked in education have had the experience in having the assignment to serve on these bodies, render their services without charge. It is sort of done as a public service.

These accreditation teams come on a campus and review the quality of the institution's offerings and then make a recommendation about whether or not it ought to be approved.

I think before I conclude my comments, Mr. Chairman, I ought to discuss for just a minute our National Advisory Committee. It was established by the U.S. Commissioner of Education in 1968 to provide advice on accreditation and institutional eligibility. It was chartered by the old Department of HEW. It was established so that the Commissioner could receive input from the distinguished educators and experienced persons in academe who had a feel for the need to preserve academic freedom and institutional autonomy at the same time that we carried out the mandate from Congress that we assure that there is reasonable quality.

Our Advisory Committee on Accreditation and Institutional Eligibility became established in the legislation, as you know, Mr. Chairman, in the education amendments of 1980. The committee is composed of 15 persons that are appointed for 3-year terms. I might indicate that the current chairman is Dr. Tim Healy. Father Healy is the president of Georgetown University.

We think we have a very outstanding and prestigious group which meet and review the petitions of those accrediting agencies. They receive a petition from an agency that wants to be on the

Secretary's approved list and they review them carefully in determining what recommendation to make to the Secretary.

We rely heavily on that advice in making our decisions. They also advise us on what criteria we ought to establish and what changes ought to be made. Since they are active in higher education, they are in touch with new trends and new developments and they do a very good job in helping us and advising us so that we do not lose sight of the reality of academe and what this responsibility is all about.

We have periodic evaluations once an accrediting agency is approved. They are approved for a period of time. The advisory committee advises us on how long the approval should be and then the recognized agencies are reviewed periodically. I would not want to leave the impression that once you are approved, you are on the list forever.

The recent Carnegie report entitled "The Control of the Campus" is a very timely publication. It contains a number of recommendations that we think are worthy of our concern and I have asked this National Advisory Committee, under the leadership of Dr. Tim Healy, to carefully analyze this Carnegie report and to make recommendations to me concerning any changes that they might deem to be necessary in view of the report.

When that review has been completed, Mr. Chairman, we will be pleased to submit our findings to your subcommittee and, as always, we are anxious to receive your advice and input.

I would like, Mr. Chairman, to introduce my colleagues here at the table, Dr. Ed Elmendorf is Assistant Secretary for Postsecondary Education; and working under him is Dick Rowe, Director of the Eligibility and Agency Evaluation Staff. I am pleased to have both Mr. Rowe and Dr. Elmendorf here and they are here because I am confident that if you or other committee members ask me any questions I cannot answer, I can pass the buck over to them. I hope that they do not prove me false in making that statement.

Thank you very much, Mr. Chairman, and it is a pleasure as always to appear here before you.

[The prepared statement of Secretary Bell follows:]

PREPARED STATEMENT OF T. H. BELL, SECRETARY OF EDUCATION, U.S. DEPARTMENT OF EDUCATION

Thank you for the opportunity to appear before the Committee to discuss the relationship between the Department's eligibility system and accreditation.

The Higher Education Act of 1965, as amended, currently authorizes a number of programs which support institutions of postsecondary education. Federal funding for these Education Department programs grew to a total of approximately seven billion dollars this past fiscal year, most of which is in the form of student financial assistance.

In order for either institutions or students to participate in these programs of Federal assistance, Congress has set certain standards for institutional eligibility. These are five in number. One of them, and perhaps the linch-pin of the five is - although the statutory language also provides some alternatives - that the institution be accredited by a nationally recognized accrediting agency.

It is because of this statutory nexus between eligibility for Federal funds and peer evaluation through accreditation that the Department has developed criteria and procedures to determine which national, regional, and specialized accrediting agencies are suitable for inclusion on the Secretary's list of recognized agencies.

Concern for academic freedom has guided the Department in structuring its system of recognition of accrediting agencies and its reliance on the decisions of these accrediting agencies with respect to eligibility of accredited institutions. The Department exercises its recognition responsibility through the establishment of criteria respecting the accreditation process. Accrediting agencies must be found to be in substantial compliance with these criteria in order to be listed by the Secretary.

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These criteria, however, have been developed only through extensive consultation with the higher education community and the National Advisory Committee on Accreditation and Institutional Eligibility.

A study was conducted by the Educational Testing Service to evaluate the criteria and procedures for recognition to determine their effectiveness in distinguishing agencies that can be relied upon to make judgments concerning educational quality. The study report issued in May 1980 concluded that the Department's procedures reliably differentiate ineffective agencies from effective ones, and our procedures remain stable from year to year in the interpretation and application of criteria.

It is important to note that the Department does not accredit institutions, but the Department does recognize agencies that are reliable authorities. Once recognized by the Department, the accrediting body has significant influence, since the institutions it approves become eligible to apply for participation in federal assistance programs.

Institutions failing to adhere to the standards set by their accrediting bodies lose their eligibility for federal assistance.

Clearly, this process is extremely critical and important to both postsecondary institutions and the federal government.

The concept of accreditation is not new. Accreditation in higher education began with the establishment of regional associations of colleges and secondary schools in the late 1800's. In the early 1900's professional, specialized accrediting activities in fields such as medicine began to be developed. Certain State agencies, such as the New York Board of Regents, also conduct accrediting activities.

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Over the past 30 years, the Commissioner and now Secretary of Education have been directed to publish a list of nationally recognized accrediting bodies through some 15 pieces of legislation. These are: the Higher Education Act, Vocational Education Act, the Act setting up the National Technical Institute for the Deaf, the Education for the Handicapped Act, Emergency School Aid Act, Elementary and Secondary Education Act, College Housing Act, Public Health Service Act, Immigration and Nationality Act, Tribally Controlled Community Colleges Act, the Act setting up the educational assistance program for enlisted members of the armed forces, the Veterans' Readjustment Assistance Act, State Technical Services Act, Social Security Act, Justice System Improvement Act, and the Depository Library Program.

There are over 40 separate statutory references to the Secretary's list affecting the work of some 10 Federal agencies. For example, over 8,000 of the 9,000 institutions that now hold threshold eligibility status for one or more Higher Education Act programs have met statutory eligibility requirements for accreditation by an agency recognized by the Secretary. "Threshold" eligibility refers to the first stage of the Department's two-tier eligibility procedure, wherein institutions or programs are determined to meet statutory requirements concerning eligibility to apply for participation in the assistance programs.

Provision is made in the law for special qualifying steps that may be taken as alternatives to accreditation. The Three Institutional Certification Process provides eligibility for 50 institutions, for example. State approval by an agency recognized by the Secretary is another alternative open to public postsecondary vocational institutions.

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Currently, the Secretary recognizes 77 components of 47 organizations as reliable accrediting bodies. This includes 13 commissions of the six regional associations and 64 other bodies of national scope that can be characterized as institutional, specialized, or a combination of the two. One State agency, the New York State Board of Regents, has been designated by the Secretary as a nationally recognized accrediting body. Seventy of the recognized accrediting components serve a direct Federal funding eligibility purpose. All agencies recognized by the Secretary serve the program approval function specified in the Veterans' Readjustment Assistance Act of 1952.

It should be emphasized that the commissions of the regional associations and the national accrediting agencies and associations have no legal control over educational institutions or programs. They promulgate standards of quality or criteria of educational excellence and accredit institutions or programs that, upon evaluation, meet the standards or criteria. Accreditation, as practiced in the United States, is largely a means of conducting non-governmental, peer evaluation of educational institutions or programs. The process is voluntary and the personnel services provided during accreditation team visits to campuses are usual unremunerated.

In 1968 the Advisory Committee on Accreditation and Institutional Eligibility was chartered by the Department of Health, Education, and Welfare to advise the Commissioner on matters relating to both recognition of accrediting agencies and the Federal eligibility for funding process.

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Under the Education Amendments of 1980, the Advisory Committee received statutory authorization as the National Advisory Committee on Accreditation and Institutional Eligibility. The Committee is composed of 15 persons appointed to three-year terms from various segments of the secondary and postsecondary education communities, the student/youth population, State departments of education, professional associations, and the general public. Supported by the Department's Eligibility and Agency Evaluation Staff, the Committee advises the Secretary concerning:

- the publication of a list of nationally recognized accrediting agencies and associations that the Secretary determines to be reliable authority concerning the quality of training offered;
- the criteria and procedures for recognizing accrediting bodies;
- the responsibility to designate State agencies as reliable authorities concerning the approval of public postsecondary vocational education and nurse education; and
- developing and recommending standards and criteria for specific categories of educational institutions for which there are no recognized accrediting bodies or State agencies, in order to establish the eligibility of such institutions on an interim basis for participation in Federally funded programs.

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The Secretary's list of recognized accrediting agencies and associations is published periodically in the FEDERAL REGISTER. The Secretary maintains a program of periodic evaluation of the recognized agencies to determine if they continue to comply with the Criteria for Recognition. The recognition process requires the designation of the scope of the recognized activities of each agency or association. If a recognized body expands its activities, and desires recognition for the new areas, it must petition for such recognition—as part of its regular, periodic review, or separately.

The Carnegie Report, Control of the Campus, is timely and contains a number of recommendations that are worthy of our concern over the issues of educational quality and Federal intrusion into academia.

I have invited the National Advisory Committee on Accreditation and Institutional Eligibility through its chairperson, Dr. Timothy Healy, to carefully analyze the Carnegie report and make recommendations to me concerning any necessary changes to the Department's policies regarding accreditation and institutional eligibility. When the review has been accomplished, I will be pleased to share our findings with this Subcommittee. In addition, I would be pleased to have your comments and be advised of any concerns you wish to share with me regarding the important subject of these hearings. In the meantime, I am pleased to respond to any questions you may have.

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Mr. SIMON. Thank you. We appreciate your being here today.

Let me just ask one question and I will yield to my colleagues. I sense from the tone of your comments that you are less concerned about the status quo than the Carnegie report. Am I incorrectly reading your comments?

Secretary BELL. Yes; I am less concerned than that report is. I need to be careful about that; it is the things you know that are not so that get you into difficulty, so I do not want to indicate that we are not going to pay attention to what our National Advisory Committee tells us about that.

I feel that if there is too much interference on the part of accrediting bodies on campuses, that it is largely in the hands of the accrediting bodies. The institutions are collectively responsible for the accreditation.

The way that we have tried to work through the accrediting agencies largely passes the baton, so to speak, over to the accrediting agencies and since they were created by groups of institutions like the north-central region that you are familiar with, Mr. Chairman, they have annual meetings and they review issues and at that time, the whole body of accrediting institutions are there.

Not too long ago, I addressed the Southern Association in Atlanta. They were convened in their annual meeting and it was at that time that the various commissions of this large regional association were reviewing their standards.

As sometimes happens, there are member institutions that do not like a decision, or that are critical of a requirement of one type or another. In my past experience before I came to this job, I was commissioner and chief executive officer of the Utah System of Higher Education. We had in our small State nine institutions.

During budget hearings, the university presidents would come in and they would say, "We need to have this much money out of the legislature or we are not going to meet the accreditation standards."

My board of regents often wondered if some of the institutions did not ask the accrediting visitors to mark them down in a certain areas so they would have leverage to get what they wanted. So, there are these kinds of critical comments made, I know, from having worked as I have, in this arena. But, by and large, I do not think that the accrediting agencies set self-serving or unreasonable standards. They do, however, set some pretty tough and rigorous requirements.

I am reminded of what is required now to be nationally accredited to offer a master of business administration program, the competence that has to be represented there. It is a very high standard and not all institutions can make it. And it is often those that feel that the yardstick is unreasonable in some way or another, that generate some of this criticism, but it does impinge back on the campus.

I think that it is out of that and the testing that is related to this that some of the criticism in the Carnegie report came out.

Mr. SIMON. Mr. Coleman.

Mr. COLEMAN. Thank you, Mr. Chairman.

Mr. Secretary, this is kind of a mystical area. I always heard about being accredited when I was on campus and something terri-

ble would happen if accreditation did not occur. You shed some light, but I suppose the real question for me is, who accredits the accreditation associations and how are there standards in place to determine who should be an accrediting agency itself?

You kind of cosied right up to the subject and did not discuss it in your remarks. I know you have an advisory committee. Is that the important committee, then, that actually performs this function? Where does the buck stop?

Secretary BELL. The final responsibility is placed on the Secretary. The National Advisory Committee was established by legislation and given statutory authority in the 1980 education amendments, but it has been in existence since 1968.

This is the body that advises us. I might ask Dr. Elmendorf as he is a former college president, and I am sure he has had to struggle with these accrediting bodies, to comment more specifically on the question, if he will.

Mr. COLEMAN. What standards are there for this advisory committee to construct or to look at before an accrediting association is, in fact, listed?

Mr. ELMENDORF. There are some very specific standards developed. In fact, you will hear testimony later on today, judging from what I have read of those to follow, that there has been a great deal of cooperation by the accrediting associations with COPA, and with the American Council on Education, in consulting with them in the development of the standards which we then publish in the Federal Register and solicit public comment.

Once developed, they become the medium for any association that wishes to use the vehicle of accreditation to: (A) get on the Secretary's list; and (B) from that list, then become subsequently eligible to receive student financial assistance.

That is the two-tiered process that the Secretary has explained, and the one that has caused most of the concern relative to eligibility and accreditation in past years.

Secretary BELL. You might explain the acronym COPA for the committee.

Mr. ELMENDORF. Council on Postsecondary Accreditation.

Secretary BELL. That is a body out in academe that sort of keeps an eye on us. They review our standards and advise us, in addition to the advisory committee. They also work with the accrediting associations. It is a national organization. I think they serve a very valuable function. We have appreciated their input and assistance.

Mr. ELMENDORF. Would you want some examples of standards?

Mr. COLEMAN. Several, not the whole laundry list.

Secretary BELL. Mr. Rowe has them.

Mr. COLEMAN. These are published in the Federal Register, you say? What might several of the important ones be?

Mr. ROWE. Mr. Coleman, these are published as a regulation and we would refer to them as criteria that the petitioner, which would be the accrediting agency that seeks the recognition from the Secretary, would satisfy. In some ways it is an open-book exam in that the criteria are published, as we indicated. They involve questions of the functions that the accrediting agency addresses and satisfies. The organization is described, along with its procedures, its responsibility to the public that it serves, and the requirements it has de-

22-141 O—84——2

veloped through its experience with accredited institutions which have been approved by it.

The criteria themselves are the product of an evolutionary process and it is a stated process. When the petition is submitted, it is carefully analyzed. As a part of the process, our staff would make an observation visit with an accreditation team to an institution in order to determine if the accrediting association is following the criteria as stated in their petition. That subsequently becomes part of an analysis report which is shared with the agency, as well as with the National Advisory Committee, which then subsequently holds—and gives an opportunity for witness as to appear in—a public hearing for the petitioner to appear in support of its petition or anyone from the public, having been given notice of the hearing, may appear in support or opposition to the petition.

That deliberation, then, results in a subsequent recommendation to the Secretary and his final decision. This is a process that, as the Secretary earlier said, is renewed each 4 years. We would be very pleased to submit to you the entire criteria as presently required to be satisfied by the associations.

Mr. COLEMAN. Mr. Chairman, one final question, if I might.

First of all, what is the appeal process if the college does not get accredited, and second, how many colleges are in a position of not being accredited on an annual basis?

Mr. ROWE. The appeal process is one of the areas that our criteria speaks to and is within the process that each of the recognized accrediting agencies, address. They have a stated process wherein there is an opportunity for appeal by the unsuccessful institution.

The period of time for accredited status granted by an association would range from several years to a maximum of 10 years. Many of the regional associations grant an institution that is visited and is fully accredited by that association, accreditation for a period of 10 years.

Others might have a lesser period, 7 years or 5 years, and it is possible, depending on the condition, that the association finds in its review of the institution to have something less than that, and other conditions may be required depending on the particular association finding. Probation or other conditions for a periodic follow-up report may be required if additional problems are discerned.

Mr. SIMON. Mr. Kogovsek.

Mr. KOGOVSEK. Thank you, Mr. Chairman.

Mr. Secretary, the Carnegie report suggests that the Council on Postsecondary Accreditation should be the body that is solely responsible for accreditation and hearing and deciding on appeal.

Do you feel that this would be a prudent direction for accreditation?

Secretary BELL. I think that this council really renders a fine service to higher education, but I think that if that became the body with the sole responsibility, then the Congress, if they took that action, would be delegating a responsibility out to a nongovernmental entity.

I think you are more in control if you can hold the Secretary responsible, and if you do not like what is going on, haul him up here before you for an oversight hearing and say, "What is going on," and "We do not like it."

I think that the other procedure, unless there is some way to get a handle on it, would be difficult for you to keep it where you wanted it. With the responsibility that the statute now gives the Secretary, we could change procedures dramatically. So could a nongovernmental agency.

I think that with that potential, we have an adequate procedure to determine whether or not students at a given institution should be eligible to participate in the student aid program, that is the big part of it, but there are other requirements, too.

Mr. KOGOVSEK. In relation to that answer, Mr. Secretary, I think you and I are both bothered by that word "control," and we do not like to use it. I know you do not like to use it. The Reagan administration repeatedly states as one of its goals, the lessening of Federal intrusion into State and local governments and the private sector.

Do you feel that the role of the Federal Government in recognizing accrediting agencies contributes to this intrusion, getting back to my original question, limiting it to one.

Secretary BELL. It certainly does. This puts you on the horns of the dilemma. I am reminded of my earlier time in Washington when we were having a large number of institutions participate in student aid, and keep in mind that private proprietary institutions can participate.

I remember an episode involving a group of barber colleges. We amended the statute and said that "In order to participate, you had to be accredited." The proprietor of these barber colleges immediately organized his Barber College Accrediting Association and declared his institutions accredited.

I guess the quality of the work and the preparation of these barbers left much to be desired from the complaints we were getting about it. Well, when that maneuver happened, that is when Congress became concerned. That is when the Federal Government got into it. Congress said, "Not only do you have to be accredited, but the accrediting body has to be approved by the Federal Government."

Now, that is where the mischief comes. That shoves us right over into that. I have spent nearly all of my adult life in education, and in the process, I have many times been outraged with the Feds. That is why I often discuss Federal control up here.

But I do not know a way around this one if we are going to avoid the maneuver that I just described to you. But it bothers me that we even have that potential for Federal control. The more that we can preserve local autonomy and enhance academic freedom, the better education is going to be in this country.

Mr. KOGOVSEK. Thank you, Mr. Secretary.

Thank you, Mr. Chairman.

Mr. SIMON. Mr. Packard.

Mr. PACKARD. Thank you, Mr. Chairman. It is a pleasure to have the Secretary back again.

Most of my experience, Mr. Secretary, has been in elementary and secondary education. My only exposure, as some of the others mentioned, to higher education is my own experience in the colleges and universities.

Would you, for my benefit at least, briefly outline the steps and the procedures that an institution would normally have to go through in order to be accredited? Would you also review for me how those accrediting conditions are established?

Are there different accreditation procedures for a medical school as compared to a law school, or a school of music, or even a beauty college? Are they accredited through the same system that any 4-year university or junior college would be accredited?

Secretary BELL. A very insightful question, Mr. Packard, and I will try to handle that as best I can.

If a new institution were established, and they wanted their students to be able to receive student aid, such as to participate in the guaranteed loan program, college work-study and grant programs, and so on, the institution would have to be approved.

If they establish themselves with good standards, those that are generally accepted in the profession, they could at the outset, get three accredited institutions to assist them by indicating that they would accept their credits from students who transfer from there over to their institutions.

Now, there is more to that requirement than what I am saying, and I will leave it there. An institution just beginning would start there. Then they would apply for accreditation with an appropriate accrediting association.

Out in California, Mr. Packard, it would be the Western Association. They would have to fill out an application for accreditation. They would have to meet some initial standards that the accrediting association has established. The community of the institutions out there have banded together and organized their accrediting association and have worked together to set their standards.

They have an organization, they have a board of directors, and each year they meet at an annual meeting and review the standards and elect their officers and so on. This hypothetical new institution would, if they met the requirements, receive some kind of temporary status if not full accreditation unless that was earned.

Dick, would it be candidacy or what would the official term be there?

Mr. ROWE. It could be candidacy for accreditation. Yes, sir.

Secretary BELL. Then following that, Mr. Packard, as they grew along and establish themselves, they could become fully accredited, but it is not a procedure that happens quickly. As a member, then, of the accrediting association, they would have a voice, as a member would have, in what the standards would be.

Now, if they were not approved, or if they could not get even this three-letter approval, then they would not be able to participate in any of the Federal funding. In many instances, there would be other problems that they would run into. Graduates' credits would not be accepted and they probably would not exist as an institution for very long.

Mr. PACKARD. Other than participating in Federal funding and perhaps the transfer of credits, what are the advantages of being accredited or the disadvantages of not being accredited?

Are private institutions also in this accreditation process, and do they come under the same requirements?

Secretary BELL. Yes, the private institutions also have to be accredited if they want to have this participation. The other advantage is that they are then able to state in their publications and in their bulletins and so on that they are a fully accredited institution and that means a great deal to students and parents and to counselors in the high schools. As you read the publications of various institutions, they list their accrediting status in that regard.

Now, if you were a Harvard or a Yale or a very longstanding distinguished institution, maybe your reputation would carry you without that, but even those institutions maintain their accreditation standing.

Mr. PACKARD. Does the accreditation filter down to all institutions of higher learning, even in very specific fields of study?

Secretary BELL. Yes, we also have specialized accrediting agencies; many of them, we could say most of them, are in the health-related fields. We had a situation in Memphis not too long ago where a Congressman called our attention to the problem down there and we referred the problem to the accrediting body that had accredited this institution.

So the private proprietary-type schools also have their accrediting bodies. Business schools, the traditionally private ones that traditionally trained secretaries and accountants and so on, have their recognized organization, and they have their accrediting association.

Mr. PACKARD. But who sets the standards of accreditation for these very specific colleges and universities like a dental school or a medical school? Are they set by people outside of that profession or does the profession itself get involved in the standards of accreditation of those kinds of schools?

Secretary BELL. It varies with each entity. I think particularly in law and medicine. The American Bar Association and American Medical Association have a great deal to say. Not only the institutions, but the organization itself, has a great deal to say about the standards of accreditation. But they must satisfy the criteria that largely have been established by our advisory body, if they are to be recognized by the Secretary.

We listen carefully to COPA, which is the umbrella organization for higher education accreditation; however, it does not include all of the private proprietary institutions.

Mr. PACKARD. Thank you, Mr. Secretary.

Thank you, Mr. Chairman.

Mr. SIMON. Thank you.

Mr. Owens.

Mr. OWENS. No questions, Mr. Chairman.

Mr. SIMON. Mr. Gunderson.

Mr. GUNDERSON. Thank you, Mr. Chairman, and Mr. Secretary, for appearing.

I guess as I listen to you, I read your testimony, I seem to follow up on Mr. Kogovsek's remarks, that if it is the policy of this administration to reduce the role of government in education, this seems to be one of the outstanding candidates, compared to many of the other things that we are considering.

If you were to propose the absolute minimum amount of government intervention from the Federal level in accreditation, how would you change present law?

Secretary BELL. If I wanted to have the minimum——

Mr. GUNDERSON. Minimum necessary in your opinion.

Secretary BELL. Well, I would possibly add to the statute in giving more direction to the Secretary. If I wanted to be certain as heads of the Department or successor entity would come and go, I would give further statutory direction that would limit what you could require and what you could not require for approval to be on the accrediting list.

Now, the ideal, of course, would be to repeal the statute totally. But the ideal, as often happens, is one of the tragedies in our life and bumps head on with the practical, and the practical is that we have so many institutions out there, excluding little proprietary schools here and there, and Congress permits them all to participate if they can meet the accreditation and eligibility requirements.

If you did not have that "if" there, there could be all kinds of fraud and abuse and ripoff. So, as long as we are going to be spending $7 billion in higher education on the Federal level, we need to have some kind of quality assurance.

I would not want to give the impression that the system that we have now does not considerably minimize the amount of interference, because of the fact that we use the means that we use, of recognizing what already exists out there in academe, and those accrediting entities are not under the control of the Federal Government. They are under the control of the institutions collectively.

Now, you could start to coerce if you had a Secretary of Education that decided that he would change that procedure, and he has broad discretion now to do that if he wants to.

Mr. GUNDERSON. You mentioned earlier in your remarks in talking about the Harvards of the world and some of the other schools and I recall when I made a choice as to where I was going to attend college that I never once checked on accreditation. It did not matter a bit to me, and I do not think it mattered to my parents or my guidance counselor. I think reputation matters a great deal.

Would you agree that reputation far exceeds even the concerns of accreditation in the selection of a school?

Secretary BELL. I think it depends upon how large and how widely known the institution you attend. If you attended a nonaccredited institution that was a very small liberal arts college that was not known outside of the State borders, in fact, was not known inside the State if it was a very large State, you would run into difficulty as you wanted to move from there.

Suppose you had a baccalaureate degree from this hypothetical institution and you wanted to do graduate work at a university. You would probably run into difficulty in having your credits approved and received and your being admitted to graduate school. I think that is where the accreditation would be significant.

I might also point out that most of our high schools in the United States are also accredited. It is not as critical there as it is on the college level, but even on the high school level, registrars

and admissions officers are looking at what high schools are accredited as they review standards.

Mr. GUNDERSON. Has accreditation done anything to improve the ability of the student to transfer credits from one school to another? It seems to me that that problem still exists, even though all schools are accredited. Ought that not be one of the major goals in this area?

Secretary BELL. The institution still can reserve the right and the faculty, the academic community, may admit whom they will under requirements that they have, and so it is not a guarantee that if you are a graduate of an accredited institution that you will be automatically admitted or that certain credits will not be challenged.

But it does tend to make the credits "legal tender," if I may use that term, more so than would be so without it.

Mr. GUNDERSON. Do you feel that more should be done in this area of transferring credits through accreditation, or do you not feel that is the role, or one of the roles, that accreditation can play?

Secretary BELL. Well, I think that it is a role that accreditation can play, but I would defend the right of each institution to set their own standards and to refuse to accept certain credits to meet their requirements if they choose to do that.

Most institutions that I know much about, if they have a question, they would have some provisional requirements, sometimes requiring an examination or other means, to determine whether or not to accept the credits.

One university that I know quite well, if you transferred there from one of these private proprietary business colleges, a 2-year secretarial, science, bookkeeping and accounting type school, they may admit you to accounting, and to a third- or fourth-level course if you had the first two, and then, depending upon how well you do in the more advanced accounting course, they would make the decision, at least one university that I know about delays its decision of whether or not to accept your credit from this business school.

That is a business school that is fully accredited by this national organization, incidentally. That is the way it works in a university in my home State.

Mr. GUNDERSON. One final question. In terms of the role of accreditation, particularly from the perspective of the department in guaranteeing that there be minimum standards of achievement and competency required, do you feel that there is a greater need for the Department's involvement in accreditation of specialized accrediting bodies, as opposed to the regional accrediting associations?

Secretary BELL. I do not believe so. I do not know if my colleagues would like to comment on that or add more or take some from that, but I do not see a greater need.

I hesitate to come before this committee and say everything is just great and perfect with how we are handling this responsibility, which this committee and the Senate committee put in the statute, I can say, however, that I wish that everything in the Department of Education was functioning as well as this is.

Mr. GUNDERSON. I would make one statement. Concerning the Secretary's statement that the responsibility for coordinating specialized versus regional accreditation really belongs with the academic community itself. I believe that with the proliferation of the specialized groups, a great deal more could be done through regional coordination so that you do not have overlap or unnecessary duplicative functions.

I do not believe that is our role, but I do believe there is a role and I do believe it is a problem.

Thank you.

Secretary BELL. I would like to note one thing, if I may, Mr. Chairman, that I failed to respond to. Dr. Elmendorf passed me a note on this, Mr. Gunderson. I think it is important to distinguish between credits being accepted and being counted toward a degree in an area of specialty.

If a student attended a vocational technical institute, a postsecondary one, and had a course in welding where he was developing his skill capacities, those credits could be accepted, and they would show on the transcript. But probably the major university in the State, unless there was some special exception, would not count that particular kind of a course toward a degree.

People say, well, they would not accept my credits, when really what they would not do was count these credits toward a specific degree because they did not fit the need that the faculty in that department required.

Mr. SIMON. Mr. Secretary, we thank you, Dr. Elmendorf, Mr. Rowe, for being here. I will submit questions to you for the record.

[Information referred to follows:]

ANSWERS TO QUESTIONS FOR SECRETARY BELL FROM PAUL SIMON

Q. Do you have any particular opinion on the link between State licensure and specialized accrediting bodies? Are there any actions the Federal government could take to prohibit that linkage?

A. The link between State licensure and specialized accrediting bodies is not a subject that is presently reviewed in the recognition process conducted by the Department of Education. State licensure of an institution is an agency requirement that must be satisfied before an institution may be accredited by a recognized accrediting agency. The State licensure of an individual's vocational or professional competence is often associated with the applicant's completion of an accredited program of studies. This link between the State and the applicant regarding licensing requirements is appropriately a State concern.

Presently, we know of no reason to support any Federal initiative that would prohibit a link between State licensure and specialized accrediting bodies.

Q. You stated in your testimony that you thought the present system of accreditation was working well. However, it appears that as a general trend the number of accrediting agencies is increasing. Do you think this expansion is necessary and will continue? How does increasing the number of agencies affect the quality of the accreditation system?

A. Yes, the present system of voluntary accreditation is working well. The Department presently recognizes 77 agencies. This includes 13 recognized regional accrediting commissions, rather than including in our count only the 6 sponsoring associations, and the 11 review committees that cooperate with the Committee on Allied Health Education and Accreditation (CAHEA), the single unit within the American Medical Association that is the final decision-making authority for a large variety of allied health education programs. Counting only the main organizations, as was done in 1952, the current list of recognized accrediting bodies stands at 47 (a growth of 19 agencies in the last 30 years).

This modest expansion is partially the result of the dramatic recent growth of postsecondary education during the past few decades. This growth of recognized agencies now appears to have stabilized, and we believe only a modest number of additional agencies will seek recognition. Indeed, much of the growth reflects the need for specialized accreditation services, particularly in the health and technical areas where the advance in scientific knowledge has created a demand for specialized service, in order to assure that technical and specialized education is competently delivered.

There is no evidence that the increase in the number of agencies has adversely affected the quality of the accreditation system.

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Q. What percentage of agencies which apply for accreditation status receive it?

A. Approximately 64% of the agencies which applied for initial recognition by the Secretary were successful. A number of agencies which withdraw their petitions or are denied initial recognition chose to improve their petitions, correct deficiencies, and establish compliance with recognition criteria prior to resubmitting new petitions for recognition. Twenty of the 55 agencies that sought recognition as nationally recognized accrediting bodies since 1968, when our records were first established, were denied initial recognition and did not reapply. In addition, ten agencies developed draft petitions but did not request formal action when they discovered that the criteria were more demanding than the agency could satisfy.

Q. How many agencies lose their right to accredit institutions as a result of the Department's reviews?

A. No agency loses its right to accredit institutions as the result of the Department's action. However, the Department has withdrawn the Secretary's recognition from three accrediting agencies. Since institutions must be recognized by the Secretary in order to receive federal funds, such loss of recognition has a major impact. There are agencies that operate an accreditation service that have never sought the Secretary's recognition. An agency must be established and operate successfully for at least a two-year period before it may submit a petition to the Secretary for his review and determination of the agency's reliability. The recognition by the Department of an agency as a reliable authority as to the quality of education or training offered by educational institutions and programs authorizes an institution, accredited by such a recognized agency, the opportunity to obtain eligibility to participate in various Federal programs. Three national agencies and one State agency have been removed from the Secretary's list subsequent to receiving recognition.

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Secretary BELL. Thank you.

Mr. SIMON. Because we have a full committee meeting at 11:30, I am going to take the liberty, if there is no objection from the other members of the committee, to ask the next three witnesses to be on a panel and we will hear all three and then toss questions at the three of them.

Dr. Ernest Boyer, the president of the Carnegie Foundation for the Advancement of Teaching, and former Commissioner of Education; Dr. Jack Peltason, president of the American Council on Education, and I might mention both of these gentlemen are former residents of the State of Illinois. I know that the members of the subcommittee are very interested in hearing that, and Dr. Richard Millard, the Executive Director of the Council on Postsecondary Accreditation.

We want to thank Commissioner Boyer for giving us, all the members of the subcommittee, copies of the "The Control of the Campus," the book that your foundation produced.

Dr. Boyer, we will hear from you first.

STATEMENT OF ERNEST L. BOYER, PRESIDENT, CARNEGIE FOUNDATION FOR THE ADVANCEMENT OF TEACHING

Mr. BOYER. Mr. Chairman, and members of the committee, I am pleased to be here to explore with you an issue which I consider to be an important one to the future of higher education. I commend your committee for the oversight inquiry that you are making.

I know the time is short and I will therefore highlight issues relevant to your inquiry into this matter of accreditation and the Federal role in it.

I respect very much Secretary Bell for his work, and I respect his opinions expressed, particularly on accreditation. I do, however, feel an obligation to highlight, based on our own committee report, and if I might do so, based on my own personal experience, a few aspects of the issue that I think are troublesome.

It is my opinion that the current arrangement of Federal oversight of accreditation is, in fact, flawed at four very fundamental points. First of all, it is my opinion that the Department of Education has clearly moved beyond the intention of the law, and I in no way speak to the current administration, I speak of a history that dates perhaps 10 or 15 years, so I share part of their responsibility of which I speak. This is in no way to be viewed as a comment on the current administration.

Over the years, what started as a simple strategy to sort out the good apples from the bad apples, that is, is this institution minimally to be trusted in order to get Federal aid slowly, but surely, moved into an elaborate device to accreditation an end in itself.

Quite simply, the Department has become the accreditor of the accreditors, and as I see it, unwittingly perhaps, the Commissioner, now Secretary, has become the national commissar for accreditation.

I see nothing in the intent of the law that created this procedure to have a device by which an agency wishing to be certified as an accrediting body should have Federal authority. Rather, the device was how can the Federal Government figure out a means by which

we eliminate those who might be untrustworthy in handling Federal money. Those are two very separate processes.

So, in my own view, this process has slowly gone far beyond what was originally intended. Let me give you an example.

A university might be regionally accredited. That says in effect, you are legitimate, you are no fly-by-nighter, we can trust you to get Federal money. But that is not enough. An accrediting agency in speech or journalism or psychology comes to the Secretary and says, accredit us. Then these bodies are established, even though they are subunits within an already legitimate institution.

I see no reason why the Federal Government is engaged in accrediting bodies that are not necessarily related to cross the threshold of legitimacy for Federal support.

Let me give you another example. The health science, freestanding science institution, not one part of the university, they receive appropriate accreditation through their medical association.

Nonetheless, the Secretary or Commissioner of Education also would accredit the health science, the clinical lab association, or the nurse anesthetist association, or the physical therapy association, even though they are subunits within an already accredited unit.

Second, I must say that I think the current arrangement involves the Government in a function that it is not well equipped to perform and, in fact, that does not work very well in the end.

When I was Commissioner, I studied with care these criteria that were asked for this morning, but not clearly defined. I can only tell you that when you get your list of criteria the Department uses, you will find them very vague and you will also find them primarily dealing with process and not with substance.

You will see questions about who is on your accrediting board, do you allow for due process, but I can only assure you that after that elaborate procedure is met, and all of the criteria established here in Washington have been met, in the end, the Commissioner or Secretary has very little, if any, assurance that there will be a process to assure the institution is safe and legitimate as a place to receive Federal money. It just does not work.

For example, we have had default rates that have plagued this Government since student loans began. When I was Commissioner, the NDSL rate, as I recall, the default rate was 18 percent. The other loan program, guaranteed loan, was hovering around 12 or 13 percent.

The irony is all of those institutions were accredited. We did an institution-by-institution analysis to discover that some accredited colleges had a default rate of 5 percent, some had a default rate of 85 percent, they were all regionally accredited, and some of them had specialized accreditation from 8 or 10 organizations.

Now, we have this elaborate procedure not to accredit, but rather to guarantee that the Federal moneys are going to accreditable institutions, only to discover that when you pull back the veneer of that, the range of efficiency went from high efficiency to absolute scandal.

So we have, it seems to me, machinery in which the Government has gone beyond the intent of the law. The criteria are vague, and in the end, it does not work.

There are two other concerns which trouble me very much from personal experience you might say, Mr. Chairman. I believe the current arrangement is used by special interest groups to resolve disputes.

Now here I draw the distinction that one of the colleagues made between regional and specialized. I think that is a very important line of inquiry to pursue.

When I was Commissioner, there was a dispute among the podiatrists as to which of the accrediting organizations emerging represented the true philosophy of podiatry. I found myself in the rather unconfortable position of having to listen to long testimony, and indeed was taken into court to justify my decision of having approved Podiatry Accrediting Association A, as opposed to Podiatry Accrediting Association B, based upon some subleties of how one treats sore feet. I must tell you, I was not, in my judgment, the best judge in the world to draw that line.

On the other hand, I simply say that is the end result of this business of naming a Commissioner or Secretary to become the authority in determining the policies within the interior of these specialized bodies and having to say, you are the body that truly represents this specialized association. They in turn then go to the colleges and establish their Good Housekeeping Seal of Approval.

I do genuinely believe that the accrediting process at the Federal level is occasionally used by special interest groups to air their own disputes.

The final point, and I think this is what brings us to this table today, at least it certainly is the point that our own Carnegie report took special cognizance of, is the current accreditation arrangement, especially of the specialized bodies, which is used to gain prestige by those bodies and then that prestige is in turn used to bring leverage against colleges and universities.

Let me spell this out the way I think it goes. A special interest group wants to gain added leverage and prestige nationally. What is the simplest way to do it? Under the current law, it is to come to Washington and get the Commissioner, the Secretary of Education, to put you on "his approved list." Now once you meet those criteria, then you can immediately print in your brochure, "Recognized by the Secretary of Education of the U.S. Government."

With that kind of leverage, you can then go to colleges and say, "We are on the Secretary's approved list. Therefore, we feel we should come to your college to have oversight of that particular part of your program."

The leverage then moves right down on the campus and I think, if I might say so, Mr. Chairman, Secretary Bell's view of the pressure that brings to institutions was, frankly, quite more sanguine than our own.

When I was chancellor of the State University of New York, I remember vividly we were having an internal discussion with one of our distinguished specialty colleges that I thought was world-ranked about whether they were going to get two associate deans appointed. This was budget-crunch time. I did not think they needed the two deans, but the dean of the college thought they did.

Well, lo and behold, accreditation time came and I was waited upon, if that is the right word, by the accrediting committee from

that specialized body and they advised me that if we did not approve those two deanships, associate deanships, that the accreditation of that institution was in jeopardy.

I was frankly nonplussed. I said, "I have been told now for years by the dean that this is the world-ranking institution in this particular speciality." These two administrative appointments now plummeted the school to the point where you do not even recognize it as worth of accreditation.

It was clearly a ploy, and I mention it here, not to air my own dirty laundry, but to say that there are examples that could be repeated frequently that indicate the specialized accrediting, in some instances, is used to advance certain special ends of the special interest groups.

Now, I do not blame the Secretary of Education for these abuses, but I do find it curious to suggest that the Department can stand aside and say, well, that is the institution at work, when in fact, all of the authority for that activity is drawn precisely from the Federal Government.

I do not think that the Government can be detached from a process that eventually works its way down to the local campus. Now, whether through criteria one can avoid this or not, I am not sure, human beings being what they are.

We do suggest in our report, however, and I will close my remarks with this. We think a lot might be gained in the spirit of deregulation and very little, if anything, lost. If, in fact, we look more to the association that has been established as the umbrella organization, holding it accountable to be sure in some ways that the law might establish.

But the irony is, and here I can only speak as a former bureaucrat, the current arrangement makes the Secretary fully responsible, while in the end, there is very little control he has over the outcome, and he still then sees the fraud abuse and the other fallout that occurs.

I do believe that there may be a way, in answer to the question of Mr. Packard, what is the way we might resolve this dilemma?

I think it would be possible to take one further step toward self-regulation to establish criteria that might be understood by the Council on Postsecondary Education and then let the profession, in fact, be held more accountable than we do today, simply believing the current arrangement does not work.

I might say, Mr. Chairman, that in the end, based on my experience, accreditation notwithstanding, the Administrator of this Department still has to decide if an institution is so abusive that funds must be withheld.

In the end, the decisions, the agonizing decisions I had to make, were not on the question, well, is this a good accreditation committee or a bad one? Frankly, that was paperwork.

In the end, the real question was, do we have on the margins of this great operation some institutions, even those accredited, that are not doing their job very well and what do we have to do about it?

So the administrative buck simply falls back on you in the end. With all of the best intentions, I think the accreditation process is

an area where Government could, in fact, take one more step back and in the process affirm the importance of self-regulation.

In the end, I think that would perhaps be a clear line to represent the reality that we have.

Thank you very much.

[The prepared statement of Ernest L. Boyer follows:]

PREPARED STATEMENT OF ERNEST L. BOYER, PRESIDENT, THE CARNEGIE FOUNDATION FOR THE ADVANCEMENT OF TEACHING

Mr. Chairman and Members of the Subcommittee:

I am Ernest Boyer, president of the Carnegie Foundation for the Advancement of Teaching. I wish to thank the committee for inviting me to meet with you today.

I am pleased to discuss briefly a recent report on the governance of higher education prepared by The Carnegie Foundation. This report entitled, The Control of the Campus, asks: How can colleges and universities maintain their independence while being answerable to the various constituencies they serve?

We conclude that, in the strictest sense, there is no such thing as autonomy in higher education. And we suggest that it is irresponsible for educators to take public money or private funds and then complain when asked to be accountable for such support.

The key issue then is not whether colleges and universities can be detached from the world of which they are inevitably a part. Rather, the issue is where the line should be drawn between the campus and the state and, most especially, how can we separate out trivial interference from essential confrontation.

We conclude that in the end, the academy must be given full authority over what we call in our report the essential core: the selection of faculty, the conduct of courses and research, the processes of instruction, the establishment of academic standards, and the assessment of performance.

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That recitation may sound unusually familiar, but these functions constitute the core of academic life, and it is here--at these points--that the independence of the campus must be uncompromisingly defended by faculty, the president, and by the governing board, which stands as a shield between the campus and the constituencies beyond.

Having defined the basic ground rules of academic governance--we then move in our report, to the issue of whether the integrity of higher education has, in fact, been violated by the state, or federal government, or the courts.

Putting it simply, has government been as bad as we have all believed?

Here, I must warn that our conclusion will be a keen disappointment to those who have a "conspiratorial" view of academic history. We found--during our two-year study--few examples where public officials have tried overtly to control the essential functions of teaching and research.

And, in fact we consider it a remarkable achievement that so much public money has been channeled to the nation's public and private campuses with so little interference.

I.

Accreditation: The Federal Connection

Mr. Chairman, there are however, several issues raised in our report that I should like to focus on today. The first, is accreditation.

In 1944, Congress passed the Servicemen's Readjustment Act, the so-called G.I. Bill. Under this law, Veterans were entitled to education benefits if they attended institutions "approved" by state education agencies--but no one was quite sure what it meant to be approved.

The Veterans' Administration had no authority to tell states how to carry out this responsibility. As a result, fly by night programs were acccredited. Shocking stories of scandal and abuse began to circulate in Congress.

In 1952, the rules were tightened. Congress directed the United States Commissioner of Education to help state agencies determine eligibility by "publishing a list of nationally recognized accrediting agencies and associations which he determines to be reliable authorities as to the quality of training offered by an educational institution." The commissioner's first published list of twenty-eight approved accrediting associations was drawn largely from the National Commission on Accrediting, the umbrella association of accrediting bodies.

22-141 O—84——3

During the past thirty years, the Commissioner's authority to approve accrediting associations has been reaffirmed in at least twenty-five separate statutues. And as accreditation received official blessing, more and more associations sought federal approval. An office called the Division of Eligibility and Agency Evaluation in the United States Office of Education developed detailed criteria to decide which accrediting agencies the government should approve.

By 1982, sixty-four associations--both regional and professional--were on the Commissioner's (now Secretary's) list. Self-regulation in American higher education was formerly backed by the power of the state. The bureaucracy was kept busy evaluating the evaluators. And access to billions of federal dollars is now limited to institutions accredited by agencies on the Secretary's approved list.

Frankly, Mr. Chairman, we conclude that this process has gotten out of hand. The Commissioner, now Secretary of Education, has become, by default, the nation's accreditation czar. Special interest groups push to get on the Secretary's approved list--even though such listing has at times little or nothing to do with determining whether an institution should be eligible to receive federal support. It is inappropriate we feel for the federal government to involve itself in accreditation as an end in itself, a function that takes the Department of Education far beyond the intention of the law, and imposes on it an evaluation activity it is ill equipped to carry out.

We, therefore, have two very simple recommendations.

- First, we recommend that in determining the eligibility of colleges to participate in federal programs, the Secretary of Education should use regional accreditation as the basis for approval.

- We also recommend that--the Council of Postsecondary Accreditation--not the federal government be the agency to prepare the approved list of regional associations. Such an assessment would return us to the procedure that was used by the Commissioner when the first list of approved accrediting associations was established.

I might say parenthetically, Mr. Chairman, that if the Council on Postsecondary Accreditation is given such authority, it must demonstrate its capacity effectively to do the job, and I further believe, that the nation's college and university presidents should become still more actively involved in the work of the Council on Postsecondary Accreditation.

Our concern about government's connection to accreditation is related to concern that specialized accreditation bodies approved by the Department of Education may themselves threaten the integrity of the campus. In fifty years, the list

of approved accrediting bodies has grown from a small core to sixty-four associations, ranging from the Council for Non-Collegiate Continuing Education to the American Association of Marriage and Family Therapy, to the American Board of Funeral Service Education. Today, on many campuses a dozen or more visiting teams impose requirements that compromise the authority of the trustees and undermine the overall priorities of the institution.

The issue here is not whether professional programs should meet high academic standards. It is, rather, how detailed those standards should be; how they should be enforced; and, most importantly, whether specialized programs to improve their own demands are to fit within the larger purposes of the campus.

Looking ahead, tensions among departments and disciplines may increase as budgets tighten. In such a climate, professionals on campus may be even more tempted to abuse accreditation, using the process not to protect the public and promote excellence but to gain leverage in the competition for dollars.

More ominous is the fact that at least twenty-one associations have now been linked to occupational licensure by the state. Through such arrangements, specialized accrediting bodies--using the authority of their federal recognition--wield enormous power over higher education. They control entry into the professions, and often give states strong influence over academic matters.

To fit specialized accreditation more effectively into the overall governance of higher education the following recommendations are proposed that depend not so much on the federal connection but on the academy itself:

- We recommend that standards for specialized accreditation focus on outcomes, and campus evaluations should be conducted with full respect for the overall mission of the institution.

- We also recommend that colleges and universities not invite to campus any specialized accrediting agency whose criteria for membership are so intrusive or detailed as to weaken an institution's own authority over teaching and research.

- We further recommend that specialized accreditation teams coordinate their visits with regional associations, and, whenever possible, such collaboration should involve sharing information and preparing combined summary reports.

- Finally, we recommend that state governments reexamine the link between occupational licensing and specialized accreditation. In some cases, alternate

routes to licensure, such as formal examinations or practical experience should be provided. In other cases, the link between licensing and accreditation should be broken altogether.

II.

Government and The Academy: New Structures

At the outset, Mr. Chairman, I suggested that government has not seriously involved the integrity of higher education. This does not mean, however, that the relationship has been problem free.

I recall during my own tenure as Commissioner, the furor over default on student loans and the subsequent proposal by government to separate eligibility from accreditation which would have put the Office of Education directly in the accreditation business. I also recall the confusion when the Office of Education proposed regulations related to the campus refund policy for students who dropped out. I further recall the debate on how to regulate research on recombinant DNA should the government give researchers a free hand in the information field and did it have a right--indeed a moral obligation--to impose constraints?

And what about protecting human subjects. Again, does government have an obligation to see to it that federal funded research does not harm participating individuals?

Mr. Chairman, we suggest in our report that even in the best of worlds fundamental questions such as these will be with us always. The governance of higher education is a dynamic not a static issue and we conclude that new government-university forums should be created to improve communication, resolve differences, and to move forward policy recommendations as new important issues are confronted.

- Specifically, we recommend that the National Academy of Sciences, establish a government-higher education research forum to exchange ideas, search for agreement on research policy and resolve disputes over the administration of existing programs. Such a forum should be organized in consultation with appropriate federal agencies and professional bodies.

- We also recommend that the American Council on Education, working with the Department of Education, should also establish a government-higher education student assistance forum to exchange ideas, search for agreement on policy, and resolve disputes over the administration of student aid programs. The

Council should also enlarge the work of its Office of Self-Regulatory Initiatives.

- Further, we propose that the policy guidelines developed by the American Council on Education's self-regulation project and by the new forums recommended in our report be considered for adoption at every instituion of higher learning to which they apply.

- And finally, we urge that guidelines should be used by accrediting teams to assist in the evaluation of individual campuses.

If federal involvement in higher education has been relatively benign, how is it that there has been, until recently at least, so much complaining about government intrusion? The answer lies, at least in part, in what we call "the cumulative impact." One regulation may not be restrictive, but many regulations quite literally smother an institution.

III.

Institutional Dependency: A Special Issue

Mr. Chairman, there is one other matter in our report that seems relevant to this hearing.

In assessing the impact of federal student aid on the nation's campuses, we identify one overarching issue.

We note that, today, hundreds of campuses now receive much of their annual revenue from the federal program of student grants or loans.

In 1978, federal student aid funds (excluding guaranteed loans) were equal to about 50 percent of the tuition revenues at public comprehensive colleges and to more than 45 percent of tuition income at public two-year colleges.

At private liberal arts colleges, federal student aid, (again exclusive of guaranteed loans) was equivalent to more than 25 percent of the tuition revenues. In aggregate, this federal support represents about 13 percent of the total income of private liberal arts colleges--a level of dependence that would have startled private college presidents not many years ago.

The governance indications of this dependency are profound. A network of federally-related institutions has been created. Almost all colleges and universities are now to some extent dependent on Wasington for survival. And, in the long

run, this may prove to be the most important governance issue to be faced.

We do not suggest, of course, that federal student aid programs should be restricted. Equal opportunity must continue as the bedrock educational policy of this nation.

But this new interdependent relationship does place a special obligation on government to see to it that the level of support is not abruptly changed. It also means that student aid should not be used to achieve other ends that would place inappropriate burdens on the campus or impose--even indirectly--political or legal or academic obligations that would restrict the institution and threaten the essential core.

Simply stated, in order to keep the governance lines very clear, student eligibility for aid should be based solely on student needs.

The founders of this nation were wise to restrict the role of the federal government in the control of American higher education. The nation's leaders have also been enlightened in recognizing that there are certain educational objectives that can best be served by federal support. Reconciling this important principle--federal support without federal control--has created a need for both vigilence and trust and the development of appropriate governance machinery to handle conflicts as they arise. Our recommendations have been designed to meet this challenge.

Mr. Chairman, it is in my view, an act of statesmanship that this committee of the House has convened a hearing on the relationship between government and higher education. I commend you and the Committee for your leadership and, once again, I thank you for the opportunity to meet with you today.

Mr. SIMON. Thank you very much, Dr. Boyer, great to have you back again.

Mr. BOYER. Thank you.

Mr. SIMON. Another regular visitor here, Dr. Jack Peltason.

STATEMENT OF JACK PELTASON, PRESIDENT, AMERICAN COUNCIL ON EDUCATION

Mr. PELTASON. Thank you, Congressman Simon, and colleagues. Because of the time and the fact that you have my written statement, let me just make a few brief comments endorsing in great part and with much enthusiasm the remarks made by my colleague, Mr. Boyer, elaborate on them briefly, and then we will have time for questions.

I am pleased that you are getting into the subject of accreditation. It is one that ordinarily leads to glazed eyes, a subject that is of great importance, but infinite complexity.

I would just build on Ernie's comments and set aside what I was going to previously say because he said so much that I would like to say. The Council of Education and the other educational associations feel very strongly that the responsibility for accreditation does belong to the higher education community.

We at the same time recognize that there is a Federal responsibility to determine who is eligible for Federal funds. The kinds of concerns of these two things get improperly intermixed and are quite real.

Both under Mr. Boyer and under Secretary Bell, the Federal Government has, I think, made considerable steps away from trying to get involved too much in details of accreditation, but that danger still exists.

If the community is going to ask the Nation to rely upon its own self-regulation, then it is incumbent upon us to make that self-regulation work more effectively. I think we have made some considerable progress in this area in the last several years.

The national educational associations have recently worked with our colleagues in COPA to restructure it in order that the heads of the institutions will have a greater voice inside the machinery of COPA and can make it work better.

We have also started to develop our own guidelines of self-regulation in addition to accreditation, publishing these and building them into the accreditation process.

As Mr. Boyer pointed out, what we are trying to do is build institutional accreditation as the centerpiece. Our concerns are primarily with the problems within the community of the proliferation and duplication by specialized accreditation.

We recognize that there is a legitimate role for some specialized accreditation. Along with the Carnegie Commission, I ask if we can also give you a report on a National Commission on Higher Education Issues, recently issued under the leadership of Robben Fleming, former president of the University of Michigan, I call your attention to the recommendation of the Commission on pages 6 and 7 where they endorse the statements that you will find very similar to those found in the Carnegie Foundation report.

That leads me to my final comment that just as sometimes the Federal Government is used improperly by specialized groups, an even greater threat, in my judgment is the improper mixing up of licensing requirements at the State level and specialized accreditation where a group will go and get the State legislature to adopt the requirement that you cannot practice the profession, or even take the examination, unless you have met the prior approval of that specialized accrediting agency.

We think that the protection for the public can be obtained through COPA approval, COPA being the association which is made up, and Mr. Millard will elaborate on this, I am sure, of representatives of the accrediting association, of the specialized accrediting associations, and of the institutions.

We feel that within that machinery, we can develop the standards and we can avoid the use of licensing, not to protect the consumer, but in essence, to build the privileges of a profession. In the educational scene, I can elaborate from my own experience on what Ernie talked about where at budget time, specialized accrediting teams lean upon you and tell you that you have a fine program, but they need more space, need to double their salaries, they need more secretaries. Otherwise, you might lose the accreditation. That is not usually accreditation to maintain its quality, but to build the profession.

What we are asking is that both the Federal and the State Governments not allow themselves to be used in that kind of a struggle. We think that through the strengthening of COPA that is the single most important thing that can be done to meet the multiple objectives.

[The prepared statement, with pamphlets, of J. W. Peltason follow:]

Prepared Statement of J. W. Peltason, President, American Council on Education

Mr. Chairman and Members of the Subcommittee:

I am Jack Peltason, President of the American Council on Education. I am pleased to have this opportunity to discuss the subject of accreditation on behalf of the presidents and chancellors of colleges and universities, as Chairman of the Assembly of National Postsecondary Educational Organizations (ANPEO), which represents their views in the deliberations of the Council on Postsecondary Accreditation.

These hearings present an opportunity to empasize the importance of nongovernmental accreditation. I can assure the Subcommittee that the higher education community is continually engaged in the process of self-evaluation which is necessary to maintain accreditation as a viable means of quality assurance.

All of the higher education associations, representing the entire spectrum of postsecondary institutions, are deeply committed to self-regulation. First and foremost, it is a professional responsibility of higher education to regulate itself. For this reason ACE, acting on behalf of the community, established its Office on Self-Regulation Initiatives to develop community guidelines in problem areas, and to advise institutional administrators on sound practices. In the last year we have issued guidelines on standards of academic progress, confidentiality of personnel files, and academic integrity and athletic eligibility.

Accreditation, of course, is the centerpiece of self-regulation. We have consistently urged the Congress to retain the nongovernmental, voluntary accreditation status granted by institutional accrediting agencies as the principal means of establishing eligibility for federal funds. The only

alternative is governmental regulation, which would put federal officials in the impossible and unacceptable position of making judgments on the educational standards of colleges and universities throughout the nation.

While we strongly support nongovernmental accreditation, it is important that we be candid with the Congress and the general public about the difficulties inherent in the accreditation process and its general weaknesses. We are pleased that this is a principal focus of the Carnegie Foundation's Report on the Governance of Higher Education. As the Report points out, accreditation is not as healthy as it should be, and we generally endorse its recommendations for improvement.

The problems of accreditation should be discussed under two separate headings: institutional accreditation (the regional associations and a few national agencies which accredit the total institution); and specialized accreditation (conducted by the ever growing number of agencies dealing with a specific curriculum).

Institutional Accreditation

Although the Report addresses only the regional accreditation agencies, it is important that these recommendations be implemented also by national accrediting groups, such as the Association of Independent Colleges and Schools and the National Association of Trade and Technical Schools, which are equally important as the regional associations in terms of the federal reliance on nongovernmental accreditation.

Perhaps the most important Carnegie recommendation is that more of the leadership from the nation's best colleges and universities must become involved in institutional accreditation as policy makers and as visiting teams members. Such leadership will be essential to implement the improvements recommended in the Carnegie Report. This is a point ACE has been stressing for several years.

The Association of Governing Boards of Universities and Colleges (AGB), which serves as a member of ANPEO, has also stressed the importance of trustee participation in the process of accreditation as a means of meeting their critical responsibility for overseeing institutional autonomy and integrity. A series of recommendations for trustee participation in institutional and specialized accreditation recently adopted by the AGB Board of Directors states that the "neglect of this opportunity by trustees may itself be a serious threat to the future of American higher education and two of its unique and essential features: self-regulation and lay trusteeship." Everyone within and outside of the field of higher education should appreciate the fact that those who represent the public interest by virtue of their service on the boards of the nation's colleges and universities are increasingly active in helping to address the issues of concern to all of us.

ACE and the other ANPEO associations will be working through the COPA Assembly of National Postsecondary Educational Organizations to consider and implement the Carnegie recommendations.

Specialized Accreditation

The Carnegie Report notes that in some instances specialized accreditation actually threatens the integrity of the campus. I agree, and here again ACE endorses the Carnegie recommendation while noting that the battle over the requirements of specialized accreditation has been waged for fifty years. It is no less intense today than it was when it was first begun. Although I think it will become less heated, I see no end to the controversy for, as the Report notes, colleges and universities cannot carry out their work in isolation.

Professional associations have a legitimate interest in the educational programs that prepare practitioners to enter a given field. They also have important contributions to make in improving educational programs and in

identifying programs of superior quality. In many cases, when kept in proper perspective, specialized accreditation serves an important educational and social function. However, some professional groups tend to use specialized accreditation as a lever to gain professional advantages which often create imbalances in the distribution of institutional resources.

The Carnegie Report recommends that state legislatures reexamine the link between occupational licensing and specialized accreditation. ACE strongly endorses this recommendation because the tie gives specialized agencies unwarranted leverage on institutions. It is critically important that the Congress not add to this leverage by using specialized accreditation as a means of establishing eligibility for federal funds.

In our judgment, federal policy and procedures have already gone a step too far in bolstering the role of specialized accrediting agencies by including them on the list of "Accrediting Agencies and Associations Approved by the Department of Education," when few of these agencies presently have any role in establishing eligibility for federal funds. ACE has recommended in the past, and continues to recommend, that a role in establishing eligibility for federal funds be the first criterion for inclusion on the Department's list.

Agencies that have no Congressionally-delegated role in eligibility should be deleted from the list: to include them hampers the community's self-regulation efforts by eroding the effectiveness of COPA sanctions in assuring responsible behavior on the part of accrediting associations. We believe that national recognition of specialized accrediting agencies is the proper function of the Council on Postsecondary Accreditation. Institutions should look to COPA to assure that requirements and practices of accrediting agencies are educationally and socially sound.

Summary

In summary, I would stress again that nongovernmental, voluntary institutional accreditation, even with its imperfections, is the best mechanism Congress can choose to establish eligibility for federal funds. Higher education and the accreditation community are aware of the problems, and we have begun to deal with them. The recommendations of the Carnegie Report are on target, and point the directions we must go for further improvement of the system.

The Board's Role in Accreditation

In 1981, a special subcommittee of the Public Policy Committee of the AGB Board of Directors was appointed to determine: 1) how the Association can educate its member trustees on the purposes of accreditation; and 2) how the Association and members of governing boards can participate constructively in the activities and procedures of accreditation with the objective of maintaining educational quality and proper institutional autonomy.

The members of the Subcommittee on the Role of Trustees in Institutional and Specialized Accreditation were:

Clark Kerr
(Chairperson)
Manager Emeritus,
Swarthmore College

Merrimon Cuninggim
Trustee, Vanderbilt University
Trustee, Duke University

Ann Ida Gannon, *BVM*
Trustee, St. Louis University
Trustee, St. Michael's College
Trustee, Ursuline College

David M. Lascell, Esq.
Trustee and Chairman, Wells College

Mary Louise Petersen
Former Member,
Iowa State Board of Regents

Samuel J. Silberman
Trustee, Fairleigh Dickinson University

J.L. Zwingle
(Consultant)
Former President of AGB

Nancy R. Axelrod
(Staff)
Vice President for Programs
and Public Policy, AGB

The subcommittee met six times over a period of 16 months. A survey was conducted to explore the range of trustee practices in institutional and specialized accreditation, and several leaders in the field of accreditation were consulted. This report was prepared by the subcommittee and adopted by the AGB Board of Directors on November 5, 1982. Although the Association of Governing Boards will continue to address the issues in this report, these recommendations complete the work of the subcommittee.

The members of the subcommittee express their gratitude for the assistance of Nancy R. Axelrod and J.L. Zwingle and for their diligence in assuming the major responsibility for writing this report.

22-141 O—84—4

Unlike many countries that depend on a centralized ministry for quality control of their educational enterprise, the United States uses a nongovernmental, self-regulatory system of assessing the institutions that make up its pluralistic system of postsecondary education. The ultimate responsibility for the integrity and autonomy of colleges and universities rests with the lay members of governing boards. Administrators and faculty members contribute to this effort by enforcing standards and reviewing educational effectiveness. The academic community also participates in the process of accreditation through voluntary associations of institutions and programs that seek to assess and enhance the quality of an institution or program and assure the public that their members are operating in the public interest.

The intent of this report is to show how the participation of trustees in the processes of voluntary accreditation can give them an immediate and effective grasp of their critical task of overseeing institutional autonomy and integrity. Further, it will be seen that neglect of this opportunity by trustees may itself be a serious threat to the future of American higher education and two of its unique and essential features: self-regulation and lay trusteeship. A fresh look at the purposes and procedures of accreditation can take colleges and universities a long way toward regaining control of their own destinies and finding a renewed sense of common purpose among institutions of all types. Failure among governing boards to take seriously the import of a strong and effective system of nongovernmental accreditation could weaken the American educational enterprise by encouraging governmental bodies to assume the responsibility for control and assessment.

In the field of voluntary accreditation, there are two major types of activity: 1) institutional accrediting; and 2) specialized or programmatic accrediting. The first of these is carried on by the six regional associations of colleges and schools and the four national institutional accrediting bodies. The second type is carried on by some 38 national organizations concerned with professional study (law, medicine, and the like) or with occupational or disciplinary programs, institutions, or units within institutions. Both groups are self-governing membership organizations. An umbrella organization, The Council on Postsecondary Accreditation (COPA), certifies the legitimacy of accrediting organizations and coordinates and maintains communication among these groups.

The original interest in institutional accrediting arose over transfer of credits and thus focused on academic standards (requirements) among institutions. In the less than a century of its history, institutional accrediting has evolved through several stages, from the first quantitative measures of faculty training, faculty-student ratios, volumes in the library, to more broad-scale concerns about clarity of purpose, consistency of performance, and assessment of outcomes—all these pointed toward questions of institutional viability, integrity, and similar concerns.

It was once true that after an institution received accreditation there was little effort to review its performance; but that time is long past. Typical practice today is for institutions not only to be reviewed regularly but for interim reports to be made. Moreover, there is an increasing practice to require special reports within a range of six to 24 months, depending on the nature of the problem. Despite these changes in practice, it is still falsely assumed by many that, once accredited, member institutions have few or no further demands to meet.

The function of the review in the process is not only continuance of accreditation but institutional enhancement. Thus it is an exercise in 1) self-examination and 2) peer review, through which process even the most distinguished institution may discover for itself certain areas of needed improvement

and, with the help of well-selected visitors, may gain new insight on some of the inevitable problems of maintaining good practice.

It is important for governing boards to take special interest in this self-assessment. Institutions today confront a set of forces that threaten the self-determination of institutions and tend to weaken voluntary accreditation. These forces are to be found partly in the nature of the current national situation and partly in the relations with governmental agencies, both state and federal, as they deal with colleges and universities. In these and other instances, there are growing criticisms of voluntary accreditation and expressions of doubt that the system will any longer suffice for the future.

As for the national situation, not much need be repeated here: The flood tide of students has begun to recede; the national economy has weakened. Competition among institutions has increased. Public criticism of education has mounted. New practices and programs among the colleges have raised questions about the quality of certain offerings. Dubious advertising and other promotional schemes have led to suspicions of fraud. The swing toward enrollment in public institutions is marked, and the plight of the private sector in education is a continuing topic of discussion.

Concurrently institutions must deal with renewed activity on the part of state higher education departments and other agencies of state government, not to mention the continued role of the federal government in all fields of education. Many feel that the period of enrollment decline and program consolidation we enter will encourage state government to play a more aggressive role in program review and in shaping critical policy decisions in postsecondary education. In the midst of this expansion of governmental role the criticisms of voluntary accreditation have mounted, most especially from governmental sources. At times it seems that validity of peer review is acceptable only when negative decisions are reached. Confidentiality is viewed as connivance. And somehow the protection of the public interest is seen as a governmental function, beyond the reach of the private sector or a system of peer review otherwise accepted in such fields as medicine and law.

In the literature of accreditation several thoughtful analyses have been published, setting forth clearly the important differences in the functions of state government, federal government, and the voluntary associations. It would be well for members of governing boards to acquaint themselves with at least some of these publications.[1] But the message for trustees to hear is not a call to battle against state and federal government. It is to emphasize the need for them to grasp the significance of voluntary accreditation and to seek means by which their own share of responsibility here can better be discharged.

As for the criticisms of institutional accrediting, limitations of space will permit only a summary. One favorite complaint is that the membership of regional associations is an "old boys' club," wherein old routines prevail and nothing new ever blossoms; that the procedures are slow and cumbersome, obstructing prompt action when needed; and that reviews are scheduled too seldom for any sustained benefit. Another criticism concerns the proliferation of specialized accreditation that tends to emphasize particular programs at the possible expense of the institution as a whole—and in fact may impinge on institutional independence. It might be useful to deal with these criticisms as part of this report, but suffice it to suggest that trustees should study and discuss these matters.

[1] Several helpful publications are listed in *The Balance Wheel* published by the Council on Postsecondary Accreditation (COPA). Single copies of this booklet are available free from COPA, Suite 760, One Dupont Circle, Washington, D.C. 20036. Resources on the accrediting process can also be obtained from the regional institutional accrediting bodies and the specialized accrediting bodies listed in the COPA brochure.

The point is not to explain or defend the procedures of the voluntary accrediting groups, but to emphasize that the process of accreditation is important to every college and university, that it bears heavily upon the issues of institutional vitality, integrity, and self-determination. Any pressure toward intrusion by state or federal agencies constitutes ultimately a threat to the future of non-governmental accreditation and the role of trusteeship. The best safeguard against that untoward development is in the readiness of governing boards to utilize the procedures of accreditation as *a means of accomplishing a major part of the central business of the boards themselves* for undertaking: 1) institutional planning; and 2) periodic evaluation.

Because accreditation is concerned largely with academic matters, some consider the lay trustee to be unqualified to participate significantly and that his/her attempts to do so may be diversionary, obstructive, meddlesome, even dangerous. Moreover, the process of accreditation and review is slow and time-consuming, demanding more than is reasonable to expect from the typical member of the governing board. Further, within large state-wide systems or at least multiple institutions under their supervision, the boards could never be expected to scrutinize individual institutions very closely.

Leaving aside for the moment the questions of time, workload, and specific approaches for appropriate trustee involvement, let us consider a matter of principle: At the core of accreditation are two concerns that directly overlap important trustee duties cited earlier—institutional planning and periodic evaluation. True, these are not functions of the individual board members but central to the corporate responsibility of boards. For trustees to give cursory attention to staff reports or oral comments on such matters is to neglect the very essence of the enterprise. In the accrediting process, governing boards could discover immediate assistance and direct access to this vitally important task.

An important decision then is this: How will the board and administration share the activity involved in self-study, the maintenance of high standards, the reach for improvement, and the safeguarding of the integrity of self-regulation, all of which underlie the accreditation process? The following recommendations for board participation in institutional and specialized accreditation are offered to guide those trustees and chief executives at institutions which do not have a level of board involvement sufficient to render the board accountable in this self-regulatory activity. A variety of effective practices have been identified in the course of the AGB subcommittee's investigation.

These recommendations should be reviewed and adapted to fit the needs, size, and complexity of the institution; the style and organization of its board; and the requirements of the individual accrediting organization(s) to which the institution belongs. Trustees and regents must look to their presidents and chancellors to help them participate constructively in accreditation as stewards and policy makers rather than part-time administrators, meddlers or academic specialists.

Recommendations for board participation in institutional accreditation

RECOMMENDATION I - Members of the board should: 1) be informed of the history, current practice, and strengths and weaknesses of their institutional accrediting associations; and 2) participate, along with their administrators and faculty members, in their activities.

Current accreditation practices have been criticized by educators, public officials, and even those who administer the work of the accrediting bodies. Like the colleges and universities they accredit, the regional associations undergo self-study and concern themselves with self-improvement. As members of these associations, trustees, administra-

tors, and faculty members should help evaluate and strengthen accrediting criteria and standards.

One of the most effective forms of participation, other than carrying out the necessary procedures as institutional candidates for accreditation or reaccreditation, is service on accrediting teams. Trustees should encourage their faculty and administrators to serve on the visiting teams for other institutions, and they should be willing to contribute time themselves as public members of teams or the commissions that govern the regionals if they are qualified to do so.

To prepare for such additional service to higher education, trustees should be aware of the ongoing activities of their institution's regional association. This can be done by reading the associations' newsletters, reviewing policy documents, attending membership meetings, or asking the president to keep the board apprised of these matters.

Some of the regional associations have developed video tapes, workshops, and other training devices to help educate trustees and others about their purposes and practices. At the very least, a discussion of accreditation should be placed on the board agenda well in advance of the self-study process to make sure the board is aware of: a) the objectives, scope, and cost of this activity; and b) its role in the process.

RECOMMENDATION II - The board should actively participate in the institutional self-study.

The self-study is at the heart of the accreditation process, and it is an exercise that should be welcomed by the board as complementary to its responsibilities for: approving institutional mission and goals; ensuring sound institutional planning and financial management; and evaluating institutional performance. It should be viewed as an integral part of institutional planning rather than simply as a means of complying with accrediting requirements. In addition to assessing its own effectiveness as a part of the self-study of the institution's governance, board members should be willing to roll up their sleeves in working with other aspects of the self-study as suggested by the chief executive. The final self-study report which is sent to the accreditation team may be too voluminous to send to each board member. The responsibility of reviewing the report might be delegated to a board committee or a summary of the findings could be shared with each trustee.

Trustees have often served as members of the institutional steering committee typically organized to coordinate the self-study. Board members may also be asked to complete questionnaires administered by the steering committee, and board officers are sometimes invited to review drafts of the results of the self-study. Depending on the organization of the board, it may be useful to assign a standing (e.g., academic affairs) or specially appointed board committee to work with the self-study. Trustees can also be helpful in identifying others who can contribute to this stage of the accreditation cycle such as members of visiting committees and advisory councils.

The self-study process is too often a sometime thing, whereas it should be continuous. If indeed the self-study does become continuous, the periodic review is made all the more valuable and much less demanding. Yet even among the most prestigious of institutions, it occasionally has been found that serious neglect of these functions comes to light when the external review takes place.

RECOMMENDATION III - The board should be informed of the objectives and activities of the visiting team.

If one accepts the proposition that the present procedures for accreditation can and should be strengthened but that the overall responsibility for this activity should continue to be nongovernmental, the accreditation team which visits the campus should not be treated as an unwelcome group of ex-

ternal examiners. The board can help the president set the stage to receive the team as a group of peers whose candor and objectivity will help the institution pursue its own goals of self-improvement, self-renewal and rededication to quality programs and services.

If misgivings about the team are based on ignorance, orientation programs should be planned for campus constituencies to explore the function, nature and value of accreditation. If they are based on dissatisfaction with the accreditation criteria of the agency or the methods employed by previous teams, the board should be aware of these concerns and be prepared to consider recommendations for improving the situation.

RECOMMENDATION IV - The board or its representatives should meet with the visiting team.

Accrediting teams which complete their campus visits without any direct communication with board members are likely to leave the institution with serious questions about board involvement in the governance process. The way in which the trustees interact with the members of the visiting team should be a function of the requirements of the accrediting associations (some routinely schedule meetings with board members) and/or the wishes and independent initiative of the board and chief executive. In some instances, board officers or the members of the executive committee are interviewed. In other cases, all of the members of the board are encouraged to meet with the visiting team to discuss board priorities, long-range planning and other matters.

RECOMMENDATION V - The board should review the final report of the accrediting team, evaluate its findings, and help implement those recommendations it approves.

The final report of the accrediting team may call for significant institutional changes and financial expenditures. Therefore, the board must understand the rationale for the recommendations before it can approve the changes in institutional organization or practices deemed necessary to meet the association's standards as expressed by the visiting team. Once the board has considered the final report and discussed it with the chief executive, it should review carefully its role in the implementation of the recommendations, encourage and authorize the administration to implement approved recommendations, and ask the president to provide it with periodic progress reports to monitor these activities.

The internal self-study and the reports of visiting teams provide ready means for governing board review and reaction—not of course in full detail but in such manner as to provide responsible insight, foresight, and oversight. The planning and review of institutional matters revealed by such reports should be foremost in the concerns of faculty, administration and board members—a natural medium of mutual interests. To engage periodically in this exercise does not commit the board member to spending an inordinate amount of time or to a substitution of lay judgment for that of the expert. It does commit the trustee to pay close attention to the recommendations of accrediting bodies and the reactions of faculty and administration to these recommendations.

Recommendations for board participation in specialized accreditation

As a review of specific programs within an institution, specialized accreditation requires perhaps a different kind of trustee participation from that recommended for institutional accreditation. Nevertheless, the relationship of specialized accreditation to trustee concerns such as academic standards and the substantial financial and personnel costs involved in some of the specialized reviews warrants a role for trustees in this self-regulatory activity as well. In the minds of many, this is an area where the board must delegate the lion's share

On Multicampus Systems

Boards responsible for multicampus systems may shrink from any suggestion of involvement in accreditation activities because of the apparent magnitude of the task. Certainly there is a special problem here. But such boards should ask themselves and their central administrators to think about possible approaches to this task without inviting complete overload.

Regular reports from the system staff can help central boards to be reasonably informed about major findings of accrediting teams. Many systems have advisory committees of some sort, affiliated with the units within the system. These groups could well be included in some part of the larger issues of assessment. Where such a suggestion will not fit, there is the possibility of special committees co-opted by the board to examine some elements in accreditation reports and to form some judgment about matters worthy of attention by the governing board.

While recognizing the variations in multicampus structure and board organization, the board must be involved in accreditation in ways suggested by these recommendations.

of the institutional responsibility to its administration. But it must also expect the president or chancellor to keep it well informed of the policy implications of specialized activities.

RECOMMENDATION I - Trustees should be familiar with: a) the purpose and general requirements of the agencies that conduct specialized accreditation reviews at their institution(s); (b) the schedule and general activities for each review; and (c) the estimated direct and overhead costs of such reviews.

Keeping board members informed as to which agencies visit the campus, how often they come, what criteria they impose, and what this means to the institution is a much greater task at larger, more complex institutions that may participate in several specialized reviews. It need not be burdensome if the chief executive presents periodic progress reports to the board in summary fashion. If a board committee structure exists, it may be appropriate for the academic affairs committee to review these reports on behalf of the board and for the financial or executive committee to review the financial commitment of the institution to the specialized accreditation activities. At those institutions where the cost of specialized reviews will represent a significant portion of the budget, the board may be asked to approve whether specialized agencies will be invited to consider accreditation of new programs, or to review the cost/benefit ratio of existing arrangements with specialized agencies.

RECOMMENDATION II - Boards should ask their chief executives to share with them highlights of the findings of the specialized visiting team.

Typically, individual trustees do not review the reports made by specialized agencies, but the board's responsibility for approving the educational program should encompass periodic assessments of the results of the specialized reviews. In some cases, board members who are professionals in the field of review may be asked to participate in the self-study or the visit of the team. The method will depend on the size of the institution and the organization of the board, but all approaches should provide the board with an overview of the findings of the specialized visiting team, the requirements of the agencies they represent, and the consequences for the institution.

RECOMMENDATION III - Board members should participate, along with their administrators and faculty members and

representatives of the specialized agencies, in the periodic review of specialized accreditation practices.

Governing boards are in a good position to appraise the work of specialized agencies because trustees are expected to make decisions *on the basis of the welfare of the entire institution* rather than on the needs of a specific discipline. Specialized accrediting agencies can influence teaching load requirements, budgeting standards, kinds of advanced degrees required of the faculty, the length of the program, and other academic policies. These requirements should be measured against overall institutional mission and priorities established by the board and administration rather than used as the sole basis for shaping the academic program. Board members can help distinguish between those requirements of the agency that represent encroachment in institutional governance from those that encourage needed program improvement.

Trustees can encourage specialized teams to relate their individual program objectives to overall institutional objectives. Trustees can also encourage interagency cooperation when it is possible to arrange for complementary time schedules among specialized agencies and to coordinate specialized and institutional accreditation cycles. Board members can make a contribution as members of specialized visiting teams if they have expertise in the particular field of inquiry.

This booklet is the fourteenth in a series, AGB Pocket Publications, designed to give both new and experienced trustees concise, summary information on subjects and issues of high interest to governing boards. Titles in the series are:

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by the AGB Subcommittee on the Role of Trustees in Institutional and Specialized Accreditation

To Strengthen Quality in Higher Education

SUMMARY
RECOMMENDATIONS
OF THE
NATIONAL COMMISSION
ON HIGHER
EDUCATION
ISSUES

NATIONAL COMMISSION ON HIGHER EDUCATION ISSUES

Members

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University of Puerto Rico

Richard C. Atkinson
Chancellor
University of California, San Diego

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Vice President
American Council on Education

William O. Baker
Former Chairman of the Board
Bell Laboratories

Thomas A. Bartlett
Chancellor
University of Alabama System

Robert D. Benton
State Superintendent of
Public Instruction
State of Iowa

Donald M. Blinken
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State University of New York

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President
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Robert L. Clodius
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National Association of State
Universities and Land-Grant
Colleges

Eugene Cota-Robles
Provost, Crown College
University of California, Santa Cruz

Mark H. Curtis
President
Association of American Colleges

Thomas R. Donahue
Secretary-Treasurer
AFL-CIO

Meneve Dunham
President
Clarke College (Iowa)

Edward B. Fiske
Education Editor
New York Times

Robben W. Fleming, *Chair*
Former President
Corporation for Public Broadcasting
and University of Michigan

Leila Fraser
Vice President — Marketing
The Marine Corporation

E. K. Fretwell Jr.
Past Chair, American Council on
Education
Chancellor
University of North Carolina
at Charlotte

Thomas W. Fryer, Jr.
Chancellor
Foothill-De Anza Community College
District

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Association of Governing Boards
of Universities and Colleges

David P. Gardner
President
University of Utah

Sheldon Hackney
President
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Executive Director
George Meany Center for Labor
Studies, Inc.

David L. Johnston
Principal
McGill University

Bryce Jordan
Executive Vice Chancellor for
Academic Affairs
University of Texas System

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President
Carroll College (Montana)

William A. Kinnison
President
Wittenberg University

Douglas M. Knight
President
Questar Corporation

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Professor
School of Law
University of Alabama

George M. Low
President
Rensselaer Polytechnic Institute

Charles "A" Lyons, Jr.
Chancellor
Fayetteville State University

Robert H. McCabe
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Miami-Dade Community College

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National Association for
Equal Opportunity in Higher
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Vassar College

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Director
National Commission on Higher
Education Issues
Chancellor
University of Houston at
Clear Lake City

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President
Brown University

Stephen Joel Trachtenberg
President
University of Hartford

Phyllis A. Wallace
Professor of Management
Alfred P. Sloan School of Management
Massachusetts Institute
of Technology

George B. Weathersby
Commissioner for Higher Education
State of Indiana

Arnold R. Weber
President
University of Colorado

David A. Wilson
Executive Assistant to the
President
University of California Systemwide
Administration

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Foreword

The National Commission on Higher Education Issues, composed of knowledgeable men and women inside and outside the postsecondary community, was established to help the nation's colleges and universities address some of their pressing concerns. The Commission, which existed for a year and held four meetings, was organized through the cooperation of ten presidential-level higher education associations and was financed by the John D. and Catherine T. MacArthur Foundation.

From the outset, the Commissioners decided not to be a study group, not to have background papers prepared, and not to publish a voluminous report for wide circulation. The goal was, rather, to take advantage of the differing perspectives and cumulative experience of the Commissioners in order to make a few concrete, brief, and practical recommendations to those who make policy and implement decisions in higher education.

For higher learning, the most precious asset is public confidence. Despite constrained resources, higher education has, on the whole, managed to maintain the quality of its programs. But there are signs that quality standards are being jeopardized. Criticism is growing that many entering students are deficient in the academic skills necessary to successful pursuit of higher education, along with the subsequent suggestion that degrees no longer certify that those who earn them are men and women of learning. These warning signs will be ignored only at great peril.

For this reason the Commission selected for its primary attention the issue of enhancing academic quality. During the course of its deliberations many other related matters were also addressed. The report presented here, however, deals only with those issues directly connected with improving quality in higher education and with strengthening public confidence in the nation's higher education institutions. As a result, the report reflects only a portion of the Commission's actual work.

When issues arose that were recognized as being addressed by other agencies, the Commission judged that the most useful course was to direct the staff to bring the Commission's recommendations to the attention of the appropriate groups. Such groups include the Carnegie Foundation for the Advancement of Teaching which is studying extensively the need to improve relations between the postsecondary community and those responsible for education in the schools, especially at the secondary level. The Foundation also continues to study and report on various governance issues in higher education. Two other associations to which recommendations were given are the Association of American Colleges and the American Association of State Colleges and Universities, both of which are pursuing studies and projects concerned with the redefinition of the meaning and purpose of baccalaureate degrees.

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Higher education in the United States is characterized by a vast range of institutional settings. This diversity makes it difficult to formulate recommendations that are appropriate for all institutions. Moreover, given the contribution that higher education makes to this nation's well-being, the Commission might well have been tempted to formulate recommendations in language that would articulate to the public the significance of the educational enterprise. But this report is written for policy shapers and decision makers. The recommendations are not elaborately argued since the issues are familiar to the community. It is hoped that the conclusions of this knowledgeable group of Commissioners will be of assistance. Although the recommendations are stated in forthright terms, the members kept in mind that each institution is unique and that few recommendations can be appropriate to all institutions.

The recommendations reflect a consensus of the Commissioners, but no particular member should be held accountable for each recommendation. I am particularly grateful to each Commissioner for his or her dedication to the educational enterprise. As chair of the drafting committee, Barry Munitz brought together the discussions in an admirable fashion. In pursuing this task, he was ably associated with John B. Bennett of the American Council on Education.

Acknowledgment is owed especially to Thomas M. Stauffer, who served as staff director for the Commission, for his creative support of the Commission's work. The ten higher education associations that participated in establishing the Commission included the American Association of Community and Junior Colleges, American Association of State Colleges and Universities, American Council on Education, Association of American Colleges, Association of American Universities, Association of Governing Boards of Universities and Colleges, The Council of Independent Colleges, National Association for Equal Opportunity in Higher Education, National Association of Independent Colleges and Universities, and National Association of State Universities and Land-Grant Colleges.

The Commission members and staff gratefully acknowledge their debt of gratitude to the John D. and Catherine T. MacArthur Foundation for the grant that made the deliberations possible and express the hope that the results will prove advantageous to higher education.

Robben W. Fleming, *Chair*
National Commission on
Higher Education Issues

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Setting Priorities and Strengthening Administrative Leadership

SUMMARY RECOMMENDATIONS

The Commission concluded that the greatest danger to quality in higher education in the 1980s is "cuts-across-the-board." Higher education has been on short rations for at least a decade. Certainly few programs are to be found that do not serve legitimate educational needs. At most institutions, the obvious savings have been made. In many instances, reserves are being deeply eroded. Future budgetary cuts will seriously jeopardize quality. If budgets are further reduced, the critical question becomes how to reduce the scope of what is attempted. This practical approach is far preferable to maintaining all existing programs but at a level that erodes the quality of all

The pressures to make cuts across the board are tremendous, in both the public and the independent sectors. Administrators who take a little from all programs will run into less resistance than will those who try to establish priorities. Yet even over a relatively short period, the practices of the former are far more likely than the latter to threaten the quality of the enterprise.

To counter these understandable pressures, the chief executive of each institution should ensure that appropriate campus constituencies are fully involved in the establishment and timely review of mission statements, role and scope documents, and detailed strategic plans setting forth internal priorities. Resource distribution must follow these priorities, thereby reflecting and securing institutional objectives in a changing environment. Boards of trustees, which have the ultimate responsibility for institutional priorities, should support the chief executive in making resource allocations that follow these priorities. ***Priorities among allocations are likely to be controversial, and unless they are accorded trustee support, "across the boardism" is likely to prevail and thus quality will be jeopardized.***

LEADERSHIP SELECTION

The methods of recruiting and selecting administrators, particularly chief executives, are open to substantial improvement. Con-

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fidentiality is no longer the norm; many procedures are politicized; candidates are reluctant to expose themselves to the process; and tension has grown between faculty-based screening committees and boards of trustees. Increasingly, the names of candidates are released to the public prematurely and sometimes in an embarrassing manner. As a result,many highly qualified candidates, especially sitting presidents at other institutions, no longer are willing to allow their names to be considered. The result of all these impediments is a longer and more costly selection process, limited candidate pools, and increased difficulties in executive transition.

The Commission recommends that ***all persons involved in the search process should be instructed in the importance of maintaining confidentiality as a condition of their involvement.*** It further recommends that, to minimize the problem of breach of confidentiality, ***state legislatures should modify "sunshine laws" as they apply to the selection of institutional officers and faculty members.***[1]

The Commission fully endorses the need for formal selection procedures and strongly supports the development of meaningful and productive affirmative action strategies to ensure that women and minority candidates are included.

The lay governing board is one of this nation's signal contributions to quality higher education. It is important that this basic link between internal and external constituencies be as strong as possible. Elected officials or nominating committees that propose names for membership on governing boards of public or private colleges and universities should be sensitive to the essential educational mission of these boards. In public institutions, although partisan judgments and, indeed, political influence are relevant to the selection process, ***trustees should be selected fundamentally on the basis of their interest in, concern for, and ability to serve and advance higher education.*** Any attempts to select persons on the basis of factors irrelevant to academic values should be resisted.

GOVERNANCE AND CENTRALIZATION

At a time of limited resources, the Commission recognizes the need both to husband resources and to respond to community and regional needs. Yet, its deliberations led to a healthy skepticism with respect to centralization of authority in higher education and to the conviction that quality may be jeopardized when decisions about academic programs are made by agencies remote from

1. Commission member Edward B. Fiske specifies that he must disassociate himself from the recommendations regarding confidentiality in the search process and modification of "sunshine laws."

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institutions. Concern was expressed that in some states authority over institutions has become overly centralized.

Governors and legislatures should review the current pattern of coordination to determine whether evolution of the coordinating machinery has led toward lowest-common-denominator policies and destroyed the institutional flexibility that is required to sustain quality programs.

The Commission recommends that governing boards ensure that all institutions under their jurisdiction have in place procedures for systematic program evaluation. Coordinating agencies should, appropriately, see that all public institutions and those independent institutions which receive direct state support subject their programs to a rigorous process of evaluation. *The actual program evaluations should, however, be conducted at or below the level of the institutional governing board and should include extensive peer group judgments.*

Staffs of statewide coordinating boards and other public agencies concerned with higher education can, by wise and diplomatic prodding, become important components of the educational governance structure. Thus, their staff members should be selected and compensated as befits their important role. They should then be treated by university and college leaders in an open and informative fashion as partners rather than as adversaries. The same openness should characterize the relationships of institutional officers and faculties with state legislators and governors.

Enhancing Quality and Strengthening Finance

SUMMARY RECOMMENDATIONS

The relationship between quality and the adequacy of resources is much more subtle than that expressed by the proposition that the greater the resources, the higher the quality. More money does not always mean higher quality, and less money does not necessarily reduce quality. In the face of budgetary stringency, good institutions will be able to protect those activities of highest quality and relevance to their mission while deciding which other activities to eliminate.

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Nonetheless, quality is directly affected by not only the level but also the sources and stability of funding. To be sure, institutions or programs that receive public funding must be accountable for its use and provide the appropriate offices with full and complete data. Still, the highest levels of quality and efficiency will be achieved only when each institution is given maximum freedom to allocate its funds with minimal external interference. *The Commission recommends that those who allocate public funds provide incentives for efficient resource allocation and systematic evaluation of educational and managerial effectiveness.*

The continuing health of America's independent and public colleges and universities is vital to the future of the nation, and each is essential to the well-being of the other. Public colleges and universities and independent colleges and universities constitute an academic system that nourishes our country through its teaching, research, and service. The best interests of our nation are served by supporting their respective needs and endeavors so that each may contribute in its appropriate way. *The federal and state governments should take no steps that might impair the viability of this dual system in the years to come.*

Both public and independent institutions are financed to a varying extent by students and their families, private philanthropy, the states, and the federal government. Multiple funding, by its very nature, is one of the strengths of American higher education. Examination of the various sources of funding by the Commission led it to set forth some expectations for each.

STATES

In addition to stable funding, the greatest contribution states can make to promote quality in the public institutions is to assure that their funding mechanisms are not overly enrollment-driven. *Formulas based on enrollments provide little incentive to improve programs. Similarly, automatic year-end reversion of unexpended appropriations encourages spending and discourages both resource conservation and increased efficiency.*

State legislatures should avoid line-item budgets, position controls, and other mechanisms that work against the general principle of institutional flexibility within the framework of accountability. Such detailed budget requirements discourage effective and efficient administration.

All states should consider following the practice of the national government and those states that have established funds for the improvement of postsecondary education. These relatively modest funds, distributed on a competitive basis to institutions for special projects designed to enhance quality programs, have proved to be most productive.

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THE FEDERAL GOVERNMENT

A vital federal responsibility in higher education is to provide a student aid system that will assure access and choice to all qualified students. This responsibility is shared with families, students, and the states. However, it is federal aid to students that largely accounts for the high rates of participation so essential to the continued health of the nation's economy and the well-being of the society. *The Commission is pleased to note the bipartisan support for the federal role in providing student financial assistance and it recommends a continuing strong federal commitment.*

Federal primacy in the support of basic and applied research in universities preceded the growth in the student aid system. Such support recognizes that progress in technology, productivity, and economic growth and advances in medical science and space require that our universities have the capability to carry out that research. Yet, current grant and cost reimbursement policies fail to cover the real costs to the institutions for these research activities. *The Commission recommends that the federal government assume a greater responsibility for the maintenance of research capabilities at our universities.*

PRIVATE PHILANTHROPY

Though investment income and gifts may not be large as a proportion of the total resource base for higher education, they are indispensable and provide the vital margin for upholding quality in many of our colleges and universities. Institutions must become more sensitive to the changing needs of corporations for skilled personnel, and the corporations must increase their giving in recognition of the vital role that colleges and universities contribute to the health of the economy and to the quality of life in our country.

The interdependence between higher education and the private business sector is much greater than is commonly recognized. In fact, a strong national economy reflects, and is fundamentally dependent on, a strong community of higher education. Accordingly, *both business and higher education should recognize and act on the unrealized potential for enhanced cooperation and increased productivity.*

STUDENTS AND FAMILIES

Over the next several years, it seems clear, the costs of higher education will continue to rise. Unless existing financing sources are increased to meet these rising costs, fees will have to be

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increased substantially at both public and independent institutions. *In that case, mechanisms will have to be available to assist families. Specifically, institutions, banks, and the government will need to provide additional funds for student aid, in the form of grants, work-study monies, and loan capital.* The Commission expressed grave concern about the increasing numbers of graduating students who are burdened with heavy indebtedness for educational expenses.

Assuring Standards

SUMMARY RECOMMENDATIONS

No other issue consumed more of the Commission's debating time than did the question of quality standards. But on no other issue was there greater difficulty in reaching clear and concise recommendations.

It is easy to be dogmatic about raising institutional standards. However, the strength of America's higher education lies in its diversity and in the jealously guarded autonomy of each institution to experiment and establish its own standards. The Commission has no desire to urge recommendations that would undermine institutional autonomy.

Additionally, the words "quality" and "excellence" can too easily become code words for excluding from the postsecondary community all students except those who have had the advantages of a strong college-preparatory education. It is also too easy to assume that "quality" means simply what happens when the academically best-qualified students are admitted to the most prestigious institutions. Obviously, these narrow definitions are not those of the Commission.

ACCREDITATION AND DIPLOMA MILLS

The Commission endorses the present system of voluntary, nongovernmental accreditation, the center of higher education's self-regulation efforts. However, *the accreditation system, especially the policy-making bodies and evaluating teams, should include more administrators and faculty members from institutions known and respected for their high quality.* Such persons should consider it part of their professional responsibility to participate in the accreditation process. Institutional accreditation processes should focus greater attention on the integrity of academic de-

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grees, and particularly on institutional procedures for assuring that graduates have mastered the basic academic competencies.

The Commission recommends that the Council on Postsecondary Accreditation be more vigorous in controlling the proliferation of specialized accrediting agencies. Although resources, faculty salaries, office space, and other such matters are related to the quality of educational programs, ***specialized accrediting agencies should focus on institutional procedures for assuring that degrees are conferred only on students who have met stated requirements.*** Such matters as the allocation of resources, conditions of faculty service, facilities, and administrative support should be left to the discretion of institutions.

State officials, working with the Education Commission of the States, should renew their attack on diploma mills, which offer alleged academic degrees but require little or no work. The Education Commission of the States has developed model legislation designed to thwart the operation of fraudulent institutions. Public confidence in legitimate institutions of higher education would be improved were all states to adopt and enforce such legislation.

CURRICULUM

The Commission applauds the efforts currently under way to improve and strengthen undergraduate degree programs. Although it debated at some length a more precise definition of the associate and baccalaureate degrees, and explored the concept of "educational warranty," no clear consensus emerged other than the recognition that these remain vital issues and demand continued study.

With respect to the quality of undergraduate education, the Commission calls to the attention of colleges and universities the concerns expressed by such national bodies as the President's Commission on Foreign Languages and International Studies, the Rockefeller Commission on the Humanities, the National Research Council, and the Association of American Colleges. These bodies have concluded that, with few exceptions, the nation's colleges and universities are not providing future civic, business, and professional leaders with the understanding of foreign languages and cultures, of the roots of our own civilization and culture, and of the powers and limitations of science and technology that they will need to carry out both public and private responsibilities. The Commission notes that these are vexing problems and urges that the nation's faculties and administrators, in concert with others, give high priority to their correction.

The Commission did conclude that no student should be admitted to full participation in any baccalaureate degree program who has not demonstrated fundamental competencies in

reading, writing, speaking, mathematical techniques, and reasoning. Colleges and universities should work with state high school officials to establish the following minimum units of high school study, or their GED or other equivalent, for college preparation: four years of English, three years of mathematics and computation, two years of science, two years of foreign language, and three years distributed among the social sciences and the humanities.

Colleges and universities share with the primary and secondary levels responsibilities for helping to develop the competence of those who do not meet the requirements for full participation in programs leading to the baccalaureate and who wish to acquire such competence. Such students should have access to remedial work and other appropriate assistance.

Likewise, for persons who wish to upgrade their career opportunities and to advance their education, institutions must make it easier for them to participate in professional and continuing education programs. Such students should be allowed to pursue their educational objectives without undue disruption and without having to take courses merely to certify knowledge and skills already mastered. *Institutions should develop clear criteria for measuring and recognizing previously attained competencies and for linking measurement results to campus requirements for degrees and to proper placements of students in academic programs. Failure to make such provisions dulls incentive and squanders personal, institutional, and public resources.*

The future of higher education institutions is inextricably bound with adult and continuing education. Lifelong learning is more than a simple catch phrase. It has meaning and importance to the individual and to society. It is a responsibility of higher education, by both mission and role. *Appropriate and timely offerings should be provided, and adequate financial support for adult learning should be available.*

The Commission recognizes that perhaps one of the most acute educational problems facing this nation—one most directly related to assuring quality in higher education—is the need to improve the preparation of those who teach in the primary and secondary schools. The issue of recruiting and retaining the best possible teachers involves many factors other than their training during college years, but it is this training for which colleges and universities are responsible. *The Commission feels strongly that both the attractiveness of the profession of teaching and teacher preparation itself must be improved.* Foundation support could be used to advantage in identifying appropriate strategies.

Certainly high priority should be given to eliminating substandard teacher education programs. Similarly, administrators and faculty members of appropriate higher educational institutions should work with state policy makers and appropriate representatives of the elementary and secondary school systems to

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ensure that teacher certification requirements are related to performance rather than to protection of the profession.

TENURE AND POSTTENURE EVALUATION

The Commission strongly affirms the continuing importance of faculty tenure as an essential instrument to protect academic freedom, and thereby ensure the highest quality in teaching and research. It endorses the description of tenure of the Commission on Academic Tenure in Higher Education, a commission sponsored by the Association of American Colleges and the American Association of University Professors:

> An arrangement under which faculty appointments in an institution of higher education are continued until retirement for age or physical disability, subject to dismissal for adequate cause or unavoidable termination on account of financial exigency or change of institutional program.[1]

That commission urged all institutions "to take prompt and vigorous measures to improve the operation of present tenure plans in order to correct deficiencies which have become increasingly apparent in recent years" (p.39). Since then many institutions have tightened their evaluation procedures in line with this recommendation. ***But the time has come for campus administrations and faculties to review and, if needed, revise their procedures in order to assure themselves and the public that the procedures will produce fair, rigorous, and relevant evaluations.***

In the evaluation of faculty members, confidentiality is essential to frank and candid assessments of professional qualifications. A statement of procedures by which academic judgments are made should be open for inspection so that candidates and other members of educational communities can be assured that the processes of evaluation provide for full and fair review of qualifications. An avenue of redress should be available if improprieties in the process are believed to have occurred, including judgments based on factors of race, sex, or other irrelevant matters. Candidates for faculty advancement should be afforded the opportunity to know and benefit from the deliberation of peers. When these three principles are incorporated into the review process, confidentiality protects the rigor and objectivity of judgments.

One statement on confidentiality adopted by the Board of Directors of the American Council on Education and another statement on the same subject endorsed by the membership of the

1. Commission of Academic Tenure, William R. Keast, Chairman, *Faculty Tenure: A Report and Recommendations* (San Francisco: Jossey-Bass, 1973), p. 256.

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Association of American Universities provide more elaborate comments on this important matter.[2]

Academic tenure is not a guarantee of a job for life short of disability or economic disaster. In the judgment of the Commission, ***nothing will undermine the tenure system more completely than its being regarded as a system to protect faculty members from evaluations.*** Although the burden is on the institution to demonstrate "adequate cause" by peer-group judgments, "demonstrated incompetency" is adequate cause for dismissal.

Campus academic administrators, working closely with appropriate faculty committees, should develop a system of posttenure evaluation. The process should provide for periodic peer-group reviews to assure that the tenured faculty has maintained the appropriate level of competence and is performing at a satisfactory level. When equitable procedures identify faculty members of "demonstrated incompetency," the administration and faculty's responsibility is to see that the particular problem is remedied and not glossed over. Incompetent faculty members must not be protected at the expense of the students or the maintenance of quality.

Likewise, ***campuses should devise and implement regular procedures for evaluating academic administrators.*** Such evaluations should be timely and thorough, and should provide for the professional development of the incumbents under review as well as for the improvement of overall organizational efficiency.

FACULTY SALARIES

Academic salaries have not kept pace with inflation. The resulting decline in standard of living, coupled with a reduction in support for research opportunities, especially for faculty members in the humanities, has affected morale. Inadequate compensation makes it difficult to attract and retain many talented persons, particularly in fields where academic salaries are unreasonably noncompetitive with those in the private enterprise sector. Lower morale generates a sense of negativism toward the academic enterprise. The resulting threat to quality is clear. ***The Commission contends that increasing faculty salaries is among the higher priorities in the internal allocation of resources.***

In the allotment of salary funds, the Commission recommends that ***faculty compensation should be based primarily on merit, as determined by a careful peer-group and administrative evaluation of individual accomplishments.*** High inflation and

2. The statements are both titled "Confidentiality of University Faculty Personnel Files: Its Appropriate Role in Institutional Affairs," although the two texts differ at several points. The ACE Board adopted its statement on October 15, 1981; the AAU statement was endorsed by its membership at its April 1982 meeting.

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equity considerations may justify salary increases by category or according to time in grade; still, ***professional incentives and high-level performance are jeopardized by compensation programs that fail to take account of individual performance.***

COLLECTIVE BARGAINING

Collective bargaining as an established feature of American life is widespread among craft workers, industrial workers, health service employees, white-collar workers in commerce, and employees in the public service. In higher education, it has developed more recently among faculties, though it has long been used by support staff employees. Its effect on institutional quality is still uncertain, if hotly debated. Several things are, however, clear. (***a***) The debate will continue, and the verdict about the effects of collective bargaining on the academic enterprise remains in question. (***b***) Collective bargaining as a process is both legitimate and within the rights of faculties to pursue. (***c***) Both institutional administrators and faculty leaders are relatively unversed in the process, compared with other sectors, and should take pains to prepare themselves well if collective bargaining is contemplated. (***d***) Collective bargaining is a highly serious step in faculty-administration relations, and those in institutions where bargaining is in the offing should closely examine the experience in other institutions where faculties bargain collectively to see what changes in relationships may occur. And (***e***) Both the administration and faculty in an institution with collective bargaining will be unfaithful to their primary obligation—the conduct of high-quality teaching, research, and service—if they incorporate in their negotiated contracts provisions that impede fulfillment of that obligation.

Agenda for the Future

The continued welfare of the United States is tied inextricably to its higher education institutions. Strong colleges and universities are integral to the nation's vigor—economically, culturally, even spiritually. In an increasingly knowledge-based society, the importance of that relationship can only grow. Recent decades have witnessed sharp expansion in college enrollments, institutional budgets, and university research activities. This growth has been no accident, since complex technical societies need equally complex higher educational resources. Prosperity in such societies rests upon healthy colleges and universities.

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The Commission's focused agenda for continued qualitative growth is reasonable and actionable. It calls upon every campus administrator, board member, and public official to advance higher education's welfare and to address strengthening its quality. Acting on the Commission's recommendations, higher education can attain a greater sense of purpose and forward movement. Most critically, students and society will benefit from this modest but firm commitment.

The National Commission on Higher Education Issues offers its recommendations in the firm belief that higher education can participate effectively in leadership of the nation and the world. Academicians confront in the agenda offered by this report significant opportunities to benefit humankind and, at the same time, to gain a renewed sense of direction and dedication for themselves.

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Mr. SIMON. Thank you very much and all three formal statements will be entered into the record.

Dr. Millard.

STATEMENT OF RICHARD MILLARD, EXECUTIVE DIRECTOR, THE COUNCIL ON POSTSECONDARY ACCREDITATION

Mr. MILLARD. Thank you very much. My full statement is available to you. I think I had better back up a little and talk about the nature of accreditation, what it does, what the Council does, and then react to some aspects of the Carnegie report.

First, I would like to start by saying that accreditation is the primary communal self-regulatory means of academic and professional educational quality assessment.

It is, as the Carnegie report points out, a crucial part of academic and professional governance. Accreditation as a status is granted to an educational institution or program that has been found by its peers, including professional and public representatives, to meet stated criteria bearing on educational quality and accomplishment.

Accreditation as a process has two fundamental purposes: To certify the quality of an institution or program and to assist in the further improvement of such quality. What accreditation attests to is that an institution or a program has clearly defined an educationally appropriate objective, that it maintains conditions under which their achievement reasonably can be expected, that it appears, in fact, to be accomplishing them substantially, and that it can be expected to continue to do so.

There are two types of accreditation, as has already been pointed out. Institutional and specialized or programmatic. Institutional accreditation is carried out by accrediting associations which are national or regional in scope. It focuses on an institution as a whole, and thus gives attention not only to the educational program, but to such areas as effective management and administrative strength, enlightened personnel policies, financial and physical resources, student personnel services, and consumer protection.

COPA recognizes 13 institutional accrediting bodies, including the nine regional commissions, and four national institutional accrediting bodies which accredit special types of separate institutions: business, trade and technical, home study, and Bible.

Specialized accreditation is carried out by accrediting associations within specific professional or occupational fields. Specialized accrediting associations accredit programs or schools in complex, institutionally accredited institutions which prepare professionals, technicians, or members of special occupations, and in some cases, single-purpose, freestanding professional schools in these areas, in fact, in a good many cases.

Through their relations to professional associations, they are able to provide not only assurance that the program is educationally sound, but also that it is relevant to the current practices in the field. COPA recognizes 37 specialized associations.

Now, the Council on Postsecondary Accreditation is an integral part of the total self-regulatory process. It is a voluntary organization of accrediting associations and national postsecondary educational organizations designed to carry out three objectives. The

first is to recognize accrediting associations that accredit institutions and programs on the basis of demonstrated need and specified standards.

The second is to provide national leadership and understanding in speaking for accreditation, and the third is to provide services to the accrediting associations, the educational institutions and the public, by assisting and improving the general accrediting process, as well as the policies and practices of recognized accrediting associations, facilitating coordination among accrediting associations, and encouraging and conducting research relating to understanding and improvement of accreditation.

The Council consists of a board of 15 elected and 4 ex officio members, and 3 assemblies: An Assembly of Institutional Accrediting Bodies; an Assembly of Specialized Accrediting Bodies; and an Assembly of National Postsecondary Education Organizations.

The Council is the primary means of providing self-regulatory accountability of the accrediting community to the academic and professional communities and the general public. The Council's functions are broader and differ considerably from the Federal recognition process carried out by the Secretary. The latter is primarily related to determination of institution and programmatic eligibility for Federal funds.

Over the past 2 years, the relations between the Council and the Department of Education, including the eligibility and agency evaluation staff, have been cordial and cooperative.

Secretary Bell and Mr. Richard Rowe have encouraged and reinforced this cooperation. We strongly believe, as Dr. Peltason has pointed out, that nongovernmental voluntary accreditation of institutions should continue to be a major condition of institutional eligibility for Federal funds.

The self-regulatory mechanism of accreditation not only insures that quality judgments are made by qualified peers in the public interest, but is in harmony with the national emphasis on increased self-regulation in contrast to governmental regulation.

Mr. SIMON. Dr. Millard, I hate to interrupt you. We, unfortunately, are going to have in about 28 minutes a meeting of our full committee. We are going to enter the rest of your statement in the record.

[The prepared statement of Richard Millard follows:]

EXECUTIVE SUMMARY OF TESTIMONY FOR THE SUBCOMMITTEE ON POSTSECONDARY ACCREDITATION BY RICHARD M. MILLARD

1. Accreditation is the primary communal self-regulatory means of academic and professional educational quality assessment and enhancement. Accreditation attests that an institution or program has educationally appropriate objectives, maintains conditions for their attainment, is accomplishing them substantially, and can be expected to continue to do so.

2. There are two types of accreditation and accrediting associations: (1) institutional, which focuses on an institution as a whole including fiscal integrity, administrative strength, student services and consumer protection and, (2) specialized, which concentrates on specific occupational and professional fields in accredited institutions.

3. The Council on Postsecondary Accreditation (COPA) is a voluntary organization of accrediting associations and national higher education organizations designed to (1) recognize accrediting associations, (2) serve as a national focus and voice for ac-

creditation, and (3) assist in improving accrediting processes and standards and coordinating the activities of accrediting associations.

4. Voluntary accreditation should continue to be a major condition of eligibility for federal funds. Government involvement should be limited to eligibility for federal funds and should not be broadened to more extensive oversight of accrediting activities.

5. The Carnegie report is on target in recognizing the critical role of accreditation in academic governance and of specialized accreditation in maintaining excellence in the quality of the professions they serve. It rightly calls on all senior college officials to participate actively both in institutional and specialized accreditation. The report's contention that institutional accrediting bodies neglect undergraduate education is open to question. The important role of national as well as regional institutional accrediting bodies should be taken into account in considering institutional accreditation and its uses.

6. The report tends to over-generalize the "threat" of specialized accrediting associations to the "the integrity of the campus" and overlooks the increasing use of educational outcomes by specialized associations in determining educational quality. It does, however, reinforce COPA's concerns and activities in encouraging coordinated visits and information sharing.

7. Institutions can and do inform COPA of problems and COPA has procedures for their investigation and resolution. Third party testimony including testimony from institutions are utilized in the recognition process—thus fulfilling the spirit of the Carnegie recommendation on appeals.

PREPARED STATEMENT OF RICHARD M. MILLARD, EXECUTIVE DIRECTOR, THE COUNCIL ON POSTSECONDARY ACCREDITATION

I am Richard Millard, President of the Council on Postsecondary Accreditation. I appreciate the opportunity to appear before the Committee on behalf of the constituent members of the Council. These include 50 recognized institutional and specialized accrediting associations, 7 institutionally based higher education organizations, and through these members the 4100 accredited institutions in the United States.

Accreditation plays a crucial role in assessing whether an institution or program has accepted and is carrying out its commitment to quality and in providing incentives to encourage quality enhancement. Accreditation is the primary communal self-regulatory means of academic and professional educational quality assessment. It is, as the Carnegie Foundation for the Advancement of Teaching report, The Control of The Campus, points out, a crucial part of academic and professional self-governance. Accreditation as a status is granted to an educational institution or program that has been found by its peers, including professional and public representatives, to meet stated criteria bearing on educational quality and accomplishment. Accreditation as a process has two fundamental purposes: to certify the quality of an institution or program and to assist in the further improvement of such quality. As an activity accreditation can be described as the members of the academic and professional community working together to develop and validate standards, to assess the adequacy of their operations in the light of these, and to offer peer judgment and guidance to assure students and the general public of the integrity and quality of education offered.

What accreditation attests to is that an institution or program has clearly defined and educationally appropriate objectives, that it maintains conditions under which their achievement reasonably can be expected, that it appears in fact to be accomplishing them substantially, and that it can be expected to continue to do so. Accreditation is accomplished through accrediting associations which consist of institutions, programs, professional groups and their representatives, plus representatives of the public. The process of accreditation involves goal definition, self-study, peer review and judgment by the appropriate accrediting commission, board, or committee.

There are two types of accreditation and accrediting associations, institutional and specialized or programmatic. Institutional accreditation is carried out by institutional accrediting associations which are national or regional in scope. Institutional accreditation focuses on an institution as a whole and thus gives attention not only to the educational program but to such areas as effective management and administrative strength, enlightened personnel policies, financial and physical resources, student personnel services, and consumer protection. The Council on Postsecondary Accreditation recognizes 13 institutional accrediting bodies including the 9 regional commissions and 4 national institutional accrediting bodies which accredit special types of separate institutions (business, trade and technical, home study and bible).

Specialized accreditation is carried out by accrediting associations within specific professional or occupational fields which usually are closely related not only to the educational programs and to the professional associations in these areas. Specialized accrediting associations accredit programs or schools in complex institutions which prepare professionals, technicians, or members of special occupations and in some cases single purpose free-standing professional schools in these areas. Specialized associations require that

the programs they evaluate, except for free-standing schools, be part of an institutionally accredited college or university. Through their relations to professional associations they are able to provide not only assurance that the program is educationally sound but also that it is relevant to current practices in the field. The Council on Postsecondary Accreditation recognizes 37 specialized associations.

The Council on Postsecondary Accreditation is an integral part of the total self-regulatory process. It is a voluntary organization of accrediting associations and national postsecondary educational organizations designed to carry out three objectives! the first is to recognize accrediting associations that accredit postsecondary institutions and programs on the basis of demonstrated need and specified criteria related to accrediting policies and practices. The second is to provide national leadership and understanding in speaking for accreditation. The third is to provide service to the accrediting associations, postsecondary educational institutions and the public by assisting in improving the general accrediting process as well as the policies and practices of recognized accrediting associations, facilitating coordination among accrediting association, and encouraging and conducting research relating to the understanding and improvement of accreditation.

The Council consists of three assemblies: an Assembly of Institutional Accrediting Bodies; an Assembly of Specialized Accrediting Bodies; and an Assembly of National Postsecondary Educational Organizations. It is governed by a Board with 15 members elected by the Assemblies except for members at large and public members, who are nominated by the Assemblies but elected by the Board, and 4 ex-officio members including the chairman of the three Assemblies and the President of the Council. The 9 members

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of the crucial recognition committee, with the exception of the chairman, are non-board members including 2 public members nominated by the Assemblies and elected by the Board.

The Council was formed in 1975 by the merger of the National Commission on Accrediting and the Federation of Regional Accrediting Commissions on Higher Education. One reason for the merger was the realization that to insure the integrity and strength of accreditation the accrediting and higher education communities must work together through self-regulation to improve the accrediting process and to apply common high standards to the recognition of member accrediting associations. The Council is the primary means of providing self-regulatory accountability of the accrediting community to the academic and professional communities and to the general public.

The Council's functions are broader and differ considerably from the federal recognition process carried out by the Secretary. The latter is primarily related to determination of institutional and programmatic eligibility for federal funds. I am happy to report that over the last two years the relationship between the Council and the Department of Education, including the Eligibility and Agency Evaluation Staff, has been cordial and cooperative. Secretary Bell and Mr. Richard Rowe have encouraged and reinforced this cooperation.

We strongly believe that non-governmental voluntary accreditation of institutions should continue to be a major condition of institutional eligibility for federal funds. This assures that federal funds go to institutions that meet the quality requirements of the academic community. The self-regulatory mechanism of accreditation not only insures that quality judgments are made by qualified peers in the public interest and is highly cost effective but

is in harmony with the national emphasis on increased self-regulation in contrast to governmental regulation. It is important that government involvement be limited to eligibility for federal funds and not be broadened to more extensive oversight of accrediting activities.

Accreditation is carried out by literally hundreds of volunteers across the country. While it has its problems, on the whole, it has worked well in the service of the academic community and the nation. We are, however, concerned with strengthening accreditation in every way possible. The report of the Carnegie Foundation on the governance of higher education is timely and in many ways will help to facilitate the work of the accrediting associations and the Council on Postsecondary Accreditation. Its recognition of the critically important role of accreditation in academic governance is most welcome, as is its statement in relation to specialized accreditation that "we share their interest in maintaining excellence in the quality of the professions they serve". Where abuses occur in any form of accreditation they must be corrected and we are committed to work with the accrediting associations and the national higher educational associations to identify and correct these. The admonition that "senior officials at all colleges and universities should fully support their accrediting associations and participate actively in their work" has the full endorsement of the accrediting community and is crucial to the strengthening of accreditation in all its forms. There is evidence, however, that there is currently considerably more such involvement of major institutions than the report would suggest. Further, the report does not adequately recognize that this call for involvement is or should be as applicable to specialized as to institutional accreditation. While specialized accrediting associations include members of the professions and their associations, in every case their accrediting commissions and visiting teams also include educators

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and institutional representatives.

The report suggests that institutional accrediting associations have neglected undergraduate education. The fact is that 62.3% of regionally accredited institutions are undergraduate only and another 23.2% offer baccalaureate and masters programs only. All of the regional commissions assess the adequacy of curriculum in the light of institutional mission. Not to take into account uniqueness of mission would be to negate legitimate diversity and to impose the very interference in the prerogatives of institutions in curriculum development to which the Carnegie report as a whole so eloquently and rightly objects.

The report should have noted that in addition to the regional Commissions the four national institutional accrediting bodies that carry out equally effective accrediting activities in their respective areas must be taken into account in any considerations of institutional accreditation and its uses.

That regional and other institutional accrediting bodies should hold institutions accountable for good management, enlightened personnel policies, educational results and consumer protection as the report recommends is clear. However, to make this as a recommendation overlooks the fact that they do so now. All of these factors are currently included in institutional accrediting criteria. Perhaps the recommendation might well be that emphasis on these factors should be further strengthened, but what is now being done needs to be recognized.

That there have been instances of overly specific and intrusive requirements by specialized accrediting associations, even cases where the interests of the professions have dominated over concern with the campus as a whole, would be hard to deny. However, to imply that all or most specialized accreditation "threatens the integrity of the campus" is in fact a generalization that would be difficult to justify or document. It is also true that the number of specialized accrediting associations has increased over the past thirty years but this is a function of an increasing number of professions and occupations where issues of public welfare, health, safety and need for assurance of professional competence are matters of academic and public concern. In fact the number of specialized accrediting associations recognized by the Council on Postsecondary Accreditation has decreased from 39 in 1977 to 37 today. The associations in the Assembly of Specialized Accrediting Bodies not only are cognizant of the problems but in cooperation with the Council are addressing them.

In a number of areas involving specialized accreditation the report reinforces efforts currently underway and we welcome this reinforcement. In relation to institutional integrity and autonomy the COPA recognition criteria specify that an accrediting association (1) "develops and interprets its criteria to allow and encourage institutional freedom and autonomy" and (2) "examines and evaluates institutions or programs in relation to operational goals of the total institution and to educational outcomes". COPA is working with the accrediting associations to insure more effective compliance with each. Major steps have been taken by the specialized and institutional associations to encourage interagency cooperation and coordination, but to be effective this also requires institutional cooperation. It should be added that some of the specialized accrediting associations not only have under study but are making substantial progress in the further utilization of educational outcomes in

determining educational quality.

One of the recommendations of the report calls on the Council on Postsecondary Accreditation to organize and maintain an appeals process to resolve conflicts when an institution believes it has been unfairly treated by an accrediting association. Currently each recognized accrediting association as a condition of recognition must and does have a fully developed and adequate appeals procedure of its own. COPA obviously is not the forum for any quasi-judicial review of individual accrediting decisions. However, the Council fulfills the intent of the recommendation. It has a formal complaint procedure for institutions which provides for review and resolution. Institutions not only may but do frequently report to the Council problems they have with the accreditation process. During the recognition process third party testimony is solicited and any institution may submit such testimony on which the association may comment but which is taken into account in the recognition review. Further, the Council is currently considering the possibility of developing a system whereby each institution may send evaluations of accrediting activities both to the accrediting association and to the Council. Most accrediting associations including all of the regionals now provide for evaluative reviews. Finally, the higher education organizations in the Assembly of National Postsecondary Educational Organizations provide an additional institutional point of view in the determinations of the Council. Thus, there is no danger of institutional concerns going unrepresented or being left our of account.

In summary, the thrust of the recommendations in the Carnegie report on the whole are timely and helpful and call attention to the importance of accreditation. Some are already being carried out; others add to or stimulate discussion of the issues; and some need to be viewed in the light of what has already been accomplished.

Again, I want to express my appreciation for the opportunity of testifying before the Committee. I sincerely believe that the future quality, health, and integrity of postsecondary education in this country is intimately related to the effectiveness of the communal self-regulatory assessment and enhancement of quality which is voluntary, non-governmental accreditation.

Mr. SIMON. I think in order to make this a fruitful discussion, I would like to move, if we could, to questions.

So, I understand where we are, I read just the other day in the "Chronicle of Higher Education" where Boston University has—its journalism school has lost, or I am not sure whether it is voluntary or what, but they are losing their accreditation.

Now, No. 1, does the Federal Government—I recognize that we have to, through the accrediting agencies, recognize the school, but does the Federal Government, No. 1, recognize that journalism association in addition to the overall association; and No. 2, how does something like that impact on Boston University, and how is the Federal Government involved there?

Mr. MILLARD. I cannot tell you whether in that particular case that specialized accrediting agency is on the list or not.

Mr. BOYER. It is.

Mr. MILLARD. It is?

Mr. BOYER. In the back of our report, Mr. Chairman, page 93, appendix A, you will see the list of those associations that are on the Secretary's list of approved accrediting bodies, and eenie, minee, minee, mo.

Mr. SIMON. At 24, I see.

Mr. BOYER. Twenty-four is the Accrediting Council on education and journalism and mass communications, which I think almost without exception would be a subunit within a regionally accredited institution.

It is a clear example of where I think we have made accrediting the accrediting bodies, rather than asking what is the threshold activity by which we have to insure that an institution is legitimatelly able to receive Federal funds.

Make the point in your own example. Suppose the journalism school at BU does not get accredited? Does that mean Boston University is now not eligible to get student aid, or to get grants from the Department of Defense? The answer is "No."

Yet, we have been partner in giving that organization license from the Secretary to carry out its mission. It could still do it, but the point is we have added a Federal authority, and a Federal stature to that, what I consider to be voluntary effort.

Mr. PELTASON. Can I just make a comment about that?

Mr. SIMON. Yes.

Mr. PELTASON. As an example, very briefly, because one of the most distinguished journalist schools in the country recently refused to be accredited by a journalism association. The issue was the salary of the professors. The president of the institution took the position that the issue before the journalism accrediting team are these good professors, not only the rich professors.

By refusing to give them the information, they were not accredited. That is a very distinguished school and in this particular case, its reputation is so great that it did not make any difference, and because of the first amendment, journalists are not licensed.

However, if you have a licensed profession and they should ask the same question, the institution would be at a greater disadvantage because if it refused to be accredited because it thought it was an improper intrusion into the autonomy of the institution, its graduates might then suffer a disadvantage because they might not

be able to stand for the bar exam, or the county exam, or some other kind of exam.

That is where licensing and accreditation get mixed.

Mr. SIMON. Yes; go ahead, Dr. Millard.

Mr. MILLARD. I think, though, you have to keep two or three things in mind. It may well be the case that journalism is one of our recognized agencies and one of the recognized agencies by the Commissioner. I think the issue, though, that has to be kept in mind in looking at special accreditation is pointed out by the Carnegie report, where it says, "We share their interest in maintaining excellence in the quality of the professions they serve."

I think it would be a mistake to prejudge the journalism situation or a number of the others. You asked earlier about how accreditation, or I think Mr. Packard did, about how accreditation takes place and who establishes the standards?

I am not in the position of attempting to defend journalism or anyone else at this particular point, but the way the accrediting associations work, and they go back historically even further than the regional associations, it is through a cooperative effort between the members of the profession and the institutions and programs involved. Their concern is with the adequacy of the program in light of two things: One, its quality within the institution; and two, its effectiveness in preparing people for the profession.

I think this has to be kept very clearly in mind. I am not suggesting that it is necessarily the function of the Secretary to recognize them. But I think to understand the importance of specialized accreditation is very important.

Mr. SIMON. If I can interrupt, I do not think the question is whether this association is doing a good job or a bad job, and my assumption is that they are doing a good job, and that generally their suggestions are good suggestions.

The question really is, should the Federal Government be involved in recognizing this kind of an association? Now, in some cases, to use the case you used, Dr. Boyer, in the school of podiatry, you almost have to get into a very specialized kind of a thing and the Federal Government has no choice.

Mr. MILLARD. Incidentally, it was chiropractic.

Mr. SIMON. Yes; and there are other examples, but I guess my instinct is, No. 1, no journalism at either Northwestern or Boston University is going to lose their student aid because of the lack of accreditation, or that is the assumption I make anyway; is that correct?

Mr. BOYER. That is correct.

Mr. MILLARD. Right.

Mr. PELTASON. Yes, it is, sir.

Mr. SIMON. OK. So, that there is a question of how much good it does in the first place. Second, there is a question of whether we ought to be involved in that kind of minutia at the Federal level. It gets to Steve Gunderson's earlier question.

Mr. BOYER. That is why, if I might say, Mr. Chairman, it seems to me the question before the committee, if I may be so bold, at least from the Federal rule is, what is the minimum obligation that should be taken here to protect and where do we go beyond that and engage ourselves in becoming the approver of all accrediting

agencies, whether or not they are essential in establishing eligibility for Federal funds.

That is an important line that I think provides a threshold for debate and I have to tell you that from my experience, and I am not speaking of people who are ill-willed, but that operation within government has determined its mission to be the approval of all bodies that wish to be recognized as accrediting bodies, irrespective of whether they are essential to perform that threshold function of protecting eligibility for student funds.

That, to me, is a very important distinction to be drawn and as you just said, this has nothing to do with whether a given accrediting association is doing a good job or not doing a good job. In fact, I do not even think that should be a discussion for a Federal agency, save are we finding a way to sort out the good institutions from the bad ones who get the Federal money.

Mr. SIMON. Mr. Coleman.

Mr. COLEMAN. Mr. Boyer, in your remarks, you indicated, you drew in the delinquency issue on loans and so forth. Are you suggesting that accreditation is or is there a criteria for accreditation on an institutional basis of whether or not the institution has paid back government loans and what the delinquency rate of their student loans in existence might be?

Were you trying to equate that delinquency or bad character with the fact that they were or were not accredited. Is there a connection?

Mr. BOYER. As I was suggesting even under the best of efforts according to the current criteria, when you have an accredited college, you still do not give the Administrator here in Washington any assurance that he is off the hook in terms of whether they are going to use that money well.

So, we have here a problem of whether even minimum criteria involving a Federal agency is going to give protection and I illustrated the fact that all of the colleges that I know of that had high default rates, including some that had 89- and 85- and 90-percent default, had at least one accredited recognition which causes the Commissioner and Secretary to sleep well at night and say, "Well, they are accredited, no more defaults."

Well, that is just not the case, the point being that in the end, good administration still means you have to monitor performance. Now, we have talked in our report about whether regional accrediting, and I point to you, Jack, whether the institutions should not be asking the same kinds of questions when they regionally accredit that the Secretary has to ask when he is accountable to you.

Namely, do you have default rates and why? Do you have affirmative action? If you do not, why? Those are the Federal concerns, but ironically most of the criteria that we use now to establish eligibility for accreditation, and I must say most of the criteria used by the regional bodies to accredit, do not come to terms with the accountability standards that the Federal agencies are concerned about.

There are primarily two: Fiscal accountability and equity in terms of treatment of individuals.

Mr. COLEMAN. I would like to hear from the gentleman from COPA, then.

Mr. MILLARD. I think you have to make an important distinction. At the present time, all of the regional agencies do, and the institutional agencies, do look at a series of things. They look at the fiscal integrity, at the administrative strength, at the personnel services, at the adequacy of the structure for handling these issues.

Now there is an important distinction that has to be drawn in terms of day-to-day policing in this respect. The accrediting agency, by the nature of the case, cannot do that. If there are adequate complaints and so on, or if there are complaints, the accrediting agency can go back in, but accreditation is carried out by a system of volunteers, the staffs are relatively small, there is a tremendous amount of time that is devoted to it.

The accrediting associations do look carefully at the conditions which would be desirable and essential if the institution is to carry through its fiscal and other commitments.

What it probably cannot do is engage in a detailed audit of the records. This is something that is not within the function of the accrediting association. Each of the accrediting associations do, however, at the time of accreditation, or at the time of review, ask for a complete audit of the institution, fiscally as well as otherwise.

In this sense, the associations, even in relationship to affirmative action, do not have as a part of the accrediting agency function, the authority to insist on a specific formula and so on. In every case, the regionals do look, among other things, at the structure of the fairness of employment within the institution.

Now this is a different thing from saying that the accrediting agencies should police on a continuous basis. This they cannot do. They can assure, however, at least offer reasonable assurance, that the structure is such that it is conducive to effective management.

Mr. SIMON. Mr. Kogovsek.

Mr. KOGOVSEK. Thank you, Mr. Chairman.

For anybody on the panel, I guess this has been a subconscious fear that I have had over the years that accrediting agencies have been used to control small versus large.

Let me explain what I mean about that. It seems to me that some of the large institutions, State institutions, whether they are in Colorado or California or wherever, have an easier time of getting accredited year after year than some of the small institutions. I guess funding comes in here.

Is my fear warranted at all?

Mr. PELTASON. I understand your fear, but I do not think the evidence can support it. There are 3,000 colleges and universities of all sizes, of all different philosophies, public, private, some traditional, some experimental, and that is where accreditation, I think, is adapted to America's kind of higher education and pluralistic system.

It is not perfect, it gets charged both with having too rigid standards and then in the next breath, not having sufficient standards. But I do not think there is any evidence. I think it is probably accurate to say that an institution of international fame and distinction will be subject to less detailed scrutiny than a brand new one just starting out with nontraditional experimental modes, but it seems to me that that is a reasonable assumption to make.

Mr. KOGOVSEK. Let me just ask Dr. Boyer, as part of your report, you contend that higher education professionals are not taking accreditation seriously enough. Do you have any statistics on what percentage of individuals in academia actually participate in the accreditation process?

Mr. BOYER. No, I do not. I am sorry. Mr. Millard may know more about that than I, but it does give me an opening to make the following point. While I have tried, on this occasion, to explain what I thought might be more appropriate limits on Government involvement, the weight of our document is to say to the higher education community, this is an obligation you must take more seriously.

That is the overriding weight, so there is a two-sided debate here. I feel strongly that there should be a sharper focus here in Washington as to how accreditation is assessed, but the flip side of that is universities and colleges and accrediting associations had better step up to the implications.

To comment on Mr. Millard's point, if we are not able to tell the Secretary of Education that we can, through accreditation, hold institutions accountable for defaults, if we cannot say that we are going to see to it that they are clear and effective in their affirmative action, I see no other response except that the Federal officer will have to give his own oversight which I think has in it seeds of great danger.

To answer your question, our interviews suggested that especially senior academic officers—I mean by that, ranking college presidents and the like—are not as active as they once were and this has tended to, in my judgment, diminish the significance and the importance of self-policing.

I believe the importance of self-policing has to come from the most outstanding university and college leaders in the country so it says to the Nation, we can manage our own affairs. I have a feeling if we do not make that statement, then clearly the officers who report to you are going to have to figure out ways to do it on their own.

Dick may know more about the percentage of participation than I.

Mr. MILLARD. I would certainly agree with Dr. Boyer on the importance of the involvement of chief executive officers of the major institutions, as well as the lesser institutions. I think it would be fair to say that there are some institutions that have not accepted the responsibility in the past.

I think on the other hand, I can point to the effective involvement of many institutions, both through their own regional associations and through the Council. If you look at the membership of the Council board, if you look at the membership of the Middle States Commission on Higher Education Institutions, I think you will find heavy representation from major institutions.

Mr. PELTASON. If I may say, Mr. Chairman, it is not as heavy as it should be, but it is getting better. That is, our national commission made the same point, the Association of Governing Boards' publication, and it is now getting established that if you want to make the case that the community has to regulate itself, then that is the professional responsibility of everybody including the most distinguished and most experienced.

Mr. KOGOVSEK. Thank you, Mr. Chairman.

Mr. SIMON. Mr. Packard.

Mr. PACKARD. Thank you, Mr. Chairman. I have just one question.

You based a good deal of your concern on the premise that there have been abuses through the Department. Could not those same abuses also exist in a self-regulated program? Where is the tie-in with your proposal with a self-policing system of your Council to the Federal Government or to the Department of Education?

Is there any tie-in back to the Department in terms of regulations that this Council would have to follow?

Mr. BOYER. Yes, thank you. The first point I want to make is that the Secretary, and prior to that the Commissioner, for a long time has already delegated to a volunteer body. He does not go to the campus, he trusts the regionals. So we already once are removed.

I think it is not stretching it too much to say that now there is an interagency voluntary accrediting body, the Council on Postsecondary Accreditation, and that body might become increasingly the vehicle by which the Secretary carries out his legal mandate of oversight.

Now the question is, and you are asking, what might be the tissue that would connect here? We do not speak to that in our report and I think it is absolutely the nub question.

I should think it would be possible to establish perhaps a public/private panel that would allow both the Office of the Secretary and the Council to work collaboratively in developing criteria, and then have periodic oversight at the Federal level to see the extent to which the process is functioning, but stop short of having the Secretary, in effect, become involved in the step-by-step arrangement.

Now to some extent, that does perhaps still keep the Department close in but I think stops short of the arrangement now, which according to the Secretary's testimony, involves the Federal agency in recognizing what he says are "the 77 components, 47 organizations, including 13 commissions, 64 other bodies."

It just seems to me that we do not have the machinery to do it, the wisdom to do it, and when it is all over, it does not achieve the end that was intended.

Coming back to the other arrangement, we are asking in our report, and maybe this is the broader response to your question, are we at a point in governance, a very unhappy word, where, in fact, we need to think of some public/private mechanisms more formally organized in which we can negotiate issues in which public interest and private effort are to be carried out?

I think that we need to think more carefully of that. Other countries feel a bit more comfortable with a public/private engagement. I think we have seen this so brittly, it is either/or. I do not believe that is true here. As Secretary Bell said, this is a point where two interests are engaged. How can we have public oversight with maximum private effort?

As an example, in our report we suggest that perhaps the time has come for the National Academy of Sciences to join with the Federal Government in a standing oversight hearing on tension

points regarding research, such as DNA, such as use of human subjects.

Can we establish what already goes on, on an ad hoc basis, give it some kind of credibility? I think it would be possible to create a kind of ongoing forum in which the public accountability and the private machinery could negotiate the ground rules with credibility, and we would keep testing that experiment.

But I do think, Mr. Chairman, it is in a sense the essential question at the practical level.

Mr. PELTASON. Could I just comment very briefly. I think we have to again distinguish between determining which institutions ought to be accredited and which ought to be eligible for Federal funds.

The Secretary has the responsibility of doing that, and there is a difference between a prior decision and then policing it. Any institution that is not collecting the loans or violating any law or cheating on the funds ought to be investigated and the Secretary can never give up that responsibility for seeing to it that Federal funds are honestly, constitutionally, and legally spent.

That is a separable question from "Is that an accredited institution?"

Mr. MILLARD. And even from general eligibility.

Mr. SIMON. Mr. Owens.

Mr. OWENS. I would like to clarify one basic point. Are you saying that if an institution is accredited, it is automatically eligible or does the Federal Government have its own additional supplemental assessment and evaluation?

Mr. MILLARD. Given the current law, there are three conditions of eligibility. One is that the institution must be authorized to operate or chartered in the State in which it exists. The second is that it must be accredited by a recognized accrediting agency, one on the Commissioner's list or there is the three-letter alternative.

The third one is that it must meet the specific conditions of the particular program from which it is receiving funds. This does bring the Federal Government back in and I think in a very legitimate and important way.

Mr. OWENS. Does the Federal Government, on that third point, always make its own supplemental assessment and evaluation of a school, or does it rely on accreditation?

Mr. MILLARD. Dick Rowe, I think, could answer this more effectively than I, but as I understand the way this situation works, you attest to the accredited status of the institution and then the specific eligibility is established in light of the unique characteristics of the law in question.

This is done by a unit within Mr. Rowe's office.

Mr. BOYER. Could we put it this way, there is no way to become eligible for Federal funds without being accredited by one of the agencies on the approved list. A given program may have specific regulations regarding that program which have to be met, but the prior requirement is that you be accredited.

Mr. OWENS. My question is, How automatic is the eligibility and does the Federal Government or the agency of the unit responsible conduct its own separate assessment and evaluation as to whether or not those two points that you mentioned before can be met—

fiscal accountability and personnel administration to meet the requirements of affirmative action?

Mr. BOYER. No.

Mr. OWENS. They do not.

Mr. BOYER. The agency, as I understand your question, the Government does not inquire, it simply trusts that if you are accredited, you are a legitimate institution that is obeying the law, you can manage your affairs, and you will not be unfair, and all the things that Government agencies care about.

Mr. MILLARD. With one exception. As far as the student aid program is concerned, it is followed up by a specific audit of the student aid activities of the institution, which is done by the Federal Government.

Mr. OWENS. Is there anything which prohibits the Federal Government in its process of certifying or accrediting the accreditors to require that they have a strong component which looks at those two primary considerations that the Federal Government is concerned with, affirmative action and fiscal accountability?

Mr. BOYER. Mr. Owens, that is where, in my judgment, we have a big problem. When I was commissioner and I started to inquire into criteria, I felt they were very soft and mushy, and they gave me no assurance, having gone through the elaborate procedure, that the institutions that were accredited by that body would meet the two things I cared about, can they manage the money, and are they going to meet equal opportunity and fair practices.

We were not requiring that in a clear and explicit way of the accrediting bodies, and although I think it has improved, Dick, I agree with you, for a long time even those were not investigated with care by those we were frankly empowering.

Mr. OWENS. There was nothing in the law which prohibited you from requiring that, was there?

Mr. BOYER. That is precisely right.

Mr. PELTASON. The law assumes that an institution that is accredited is complying with the law.

Mr. SIMON. Mr. Gunderson.

Mr. GUNDERSON. Mr. Chairman, in light of the time, just one quick question to Dr. Boyer.

In your testimony on page 6, you make the following statement:

> Looking ahead, tensions among departments and disciplines may increase as budgets tighten. In such a climate, professionals on campus may be even more tempted to abuse accreditation using the process not to protect the public and promote excellence, but to gain leverage in the competition for dollars.

In your study, is there any indication that that exists today.

Mr. BOYER. Yes; indeed so. I must say, just for the record, we did not make an institution-by-institution survey. We did sample institutions by call and conversation to get a sense of what was going on, and there was no question, although we did not have a longitudinal study, that on many campuses, with cutbacks in budget, departments and schools within the universities were organizing themselves like pulling the wagons into a circle.

Very often they were defending their own budgets around the claim that we will lose our accreditation, or accreditation is being threatened. I do not want to say that all of that was wolf, but I am saying that there was a lot of evidence that accreditation increas-

ingly is being used for pockets within an institution to establish leverage.

I am just concerned that the Federal Government, even unwittingly, not be drawn into what I think will be increasingly a professional matter perhaps of high tension.

Mr. PELTASON. Most college presidents would endorse that statement.

Mr. MILLARD. Could I make just one comment. You would have to be awfully careful, however, of something else. This may well be true under some circumstances, but we are moving into a period of extraordinarily tight funds. It may well be the case that there are some institutions that have programs that they should not be offering at the present time because they do not have the adequate fiscal resources to carry these out.

One of the functions which the specialized accrediting associations do perform is ringing the danger signal when this is the case. If, for example, you have a law school and you do not have adequate funding to allow it to operate effectively, there is a real question as to whether you ought to have a law school and there may well be a case in which the accrediting agency is one that sounds the warning that this is a time when you really ought to take a look at whether you should have it or not.

Mr. SIMON. We thank the three of you very, very much for being here.

Mr. BOYER. Just for the record, I think, Mr. Chairman, I said "podiatrist" instead of "chiropractors," and I believe that it was that organization that caused me problems.

Thank you very much.

Mr. SIMON. Thank you.

[Whereupon, at 11:31 a.m., the subcommittee was adjourned, to reconvene subject to the call of the Chair.]

HEARINGS ON INSTITUTIONAL ACCREDITATION

THURSDAY, FEBRUARY 10, 1983

HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON POSTSECONDARY EDUCATION,
COMMITTEE ON EDUCATION AND LABOR,
Washington, D.C.

The subcommittee met, pursuant to call, at 9:40 a.m., in room 2261, Rayburn House Office Building, Hon. Paul Simon (chairman of the subcommittee) presiding.

Members present: Representatives Simon, Harrison, Coleman, and Petri.

Staff present: William A. Blakey, counsel; Maryln L. McAdam, legislative assistant; Betsy Brand, minority legislative associate; and John Dean, assistant minority counsel.

Mr. SIMON. The Subcommittee on Postsecondary Education will come to order. I will simply enter my statement in the record.

[Opening statement of Chairman Simon follows:]

OPENING STATEMENT OF HON. PAUL SIMON, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF ILLINOIS AND CHAIRMAN, SUBCOMMITTEE ON POSTSECONDARY EDUCATION

The Subcommittee on Postsecondary Education today continues its hearing on the subject of institutional accreditation. These hearings are intended to focus the Subcommittee's attention on the accreditation process, the access to and management of Federal funds (especially Title IV student assistance), and the proper role of the Federal Government in the determination of institutional accreditation.

Tuesday's witnesses provided their enlightened opinions and an important body of factual information regarding the determination of institutional accreditation under present law, the shortcomings of the Department of Education's present procedures and how that process might be improved—without sacrificing institutional autonomy and assuring proper management of Federal student aid funds.

Today's distinguished witnesses should provide another perspective on the issues highlighted in The Carnegie Foundation Report "The Control of the Campus—A Report on the Governance of Higher Education". The Subcommittee is pleased to welcome Commissioner Gordon Ambach from New York, and representatives of the Southern and North Central regional accrediting associations, and the Association of Independent Colleges and Schools—which together are responsible for accrediting the largest number of colleges, universities and proprietary institutions in America. I want to emphasize that our hearings have no specific legislative purpose. We are here to learn and I am sure we will.

I invite any accrediting associations that did not have the opportunity to present oral testimony to submit their views for the record. I want to include in the record at the conclusion of today's testimony an article by the Dean of the School of Technical Careers at Southern Illinois University entitled "Training, Retraining and Continued Professional Education for Adults". Dean Miller's article raises the prospect of the expanding number of technical career fields and the likelihood that more, rather than fewer, areas of specialized accreditation will be forthcoming.

Mr. SIMON. We are taking a look at accreditation No. 1, to see if it is a problem, and No. 2, to see if there are some modifications,

either in the statutes or in the administrative procedure that should be looked at.

It is, I think, safe to say that the Carnegie Foundation report, together with a few other things, have precipitated these hearings. We are pleased to have as our first witness the Honorable Gordon M. Ambach, the president of the University of the State of New York and the commissioner of education for the State of New York.

Mr. AMBACH. Good morning, sir.

Mr. SIMON. Good morning. We are pleased to have you. Let me apologize to you or to any other witness that may be on in another 20 minutes while I duck out just very briefly to another meeting where I have to make an appearance. I will be back, but now will turn over the chair to my colleague.

Pleased to have you here as a witness and look forward to some wisdom now.

STATEMENT OF GORDON M. AMBACH, PRESIDENT, UNIVERSITY OF THE STATE OF NEW YORK AND COMMISSIONER OF EDUCATION, STATE OF NEW YORK

Mr. AMBACH. Thank you very much, Congressman Simon.

I am Gordon Ambach, president of the University of the State of New York and commissioner of education for the State of New York. I appreciate very much the opportunity to be with you this morning. I have a statement which I have filed with the subcommittee.

Mr. SIMON. It will be entered in the record.

Mr. AMBACH. I would like to summarize that statement, making the pertinent points with respect to a State's experience in accreditation. The first portion of the testimony outlines a bit of the history of our State's role in accreditation. The second part something of the procedures that we use. Third, I would like to comment specifically on some of the recommendations in the Carnegie Foundation report, and then a very brief summary of why we expect to continue in the business of accreditation in the State of New York.

Responsibility for providing and supervising education, of course, is essentially a State and local responsibility. The board of regents of the University of the State of New York has been charged since 1784 with the responsibility of governance of all of education in New York State, that is, governance with respect to postsecondary institutions over all of the public, the independent and the proprietary institutions.

We have been an accrediting agency since 1784, with almost 199 years of experience in chartering educational institutions and approving academic programs. The regents have been recognized as an accrediting agency by the U.S. Office of Education and then subsequently by the Office of Education since 1952, the first time in which such accreditation was recognized by that Office.

Under our law, the regents and then the education department, has a specific function for program review, academic program review, and for the planning of education in our State. Very central to that responsibility, of course, is our concern for the excellence of the system in New York State.

Under our procedures, we, in fact, accredit programs. There are some 15,000 registered programs, each of which leads to a specific authorized degree, which have been registered from 250 different degree-granting institutions in our State.

There are approximately 500 new requests for programs each year, which gives you an idea of the pace at which we must continue a very current review process. We do undertake our reviews with standards which are established by the department and approved by the board of regents. We do have site visits when there is a substantial change in program direction, otherwise it is a review on the representations made by the institutions, and we use a peer review process, both from peers of faculty members within our State and outside of the State.

In order to establish our standards, we seek the advice of the college and university presidents within our State and I might note that within the past 2 years, we have an extensive review and then a concurrence or approval of our institutional chief executive officers on those standards.

Approximately every 5 years, we conduct an institutional visit for each of the degree-granting institutions. It is more frequent if there is a particular problem, but it is essentially a 5-year timeframe.

When we do a site visit, we do, of course, concentrate on the programs which have begun since the last site visit. We are in very close coordination with the Middle States in our accrediting process and also with specialized accrediting organizations where they may be reviewing programs of the institutions within our State.

We have a very strong relationship with the Middle States Association in this process, but we cannot rely solely on the Middle States Association, nor the specialized accrediting agencies, for these reasons. Generally speaking, their visits are at a 10-year timeframe and we have, as I noted, approximately a 5-year timeframe for ours. We must review more often and we have a very particular concern about reviewing new program starts even before they begin. That is, of course, not a part of the Middle States Association process.

We have a very strong need, second, for control on our academic programs because eligibility for various State assistance programs, both student and institutional, is based upon that accreditation and review process by our department.

Third, we are very much concerned about the intersector between the secondary and the postsecondary institutions and the controls with respect to both by way of articulation, by way of different program responsibilities.

Fourth, I would note that regional accreditation is, of course, a voluntary process and our concern is that each and every institution in our State, whether they would volunteer for such an accreditation or not, is provided with this thorough program review.

And fifth, I would note that we have a particular concern with the review of programs where there might be an attempt by an out-of-State institution to offer a program within our State. We have very tight controls on that and have prevented diploma mills from operating at all within the State of New York.

May I turn now quickly to the recommendations of the Carnegie Foundation report. I note that of the six recommendations that specifically address the State role, we are in strong concurrence with the first five of them. That includes the planning and providing of basic support for the comprehensive system of higher education, encouraging good management by permitting administrative decisions to be made close to the locus of implementation, creating broad categories of expenditures, fostering close relationships with regional accreditors, and promoting diversity.

I have noted in my statement specific ways in which we are taking actions which I think demonstrate our commitment to those recommendations.

I do want to emphasize that in our role, we do not review the budgets of the public institutions, nor, indeed, of independent institutions in our State. There is not a commingling of budget review and program quality review.

We do oppose one of the recommendations in the Carnegie Foundation report, that is at page 81, and it has to do with the matter of State activity on academic program review. The recommendation reads: "State officials should not involve themselves directly in the review of academic programs," and that recommendation, of course, is based on an expression earlier in the report about preserving, and I quote, "four essential freedoms of a university to determine for itself on academic grounds who may teach, what may be taught, how it shall be taught, and who may be admitted to study."

As I have described earlier, our department reviews of academic programs provide an assurance of State standards of quality. We do not, however, define course or program content or determine who shall be faculty members and how they shall teach. Nor do we make admissions policies or decisions.

We are very conscious about the delicate balance between academic freedom and institutional prerogative and the public interest.

As I noted, our responsibility is to review individual programs. We have a particular interest in controlling new starts, new programs advanced by the institutions. I think that is an extremely useful function, not only for our State, but for the institutions, because it assures that they have carefully thought through exactly what new directions they are going to take.

I would also note that by having a review on a program-by-program basis, it means that if we should find some defect, we can deal with it specifically on that program and not on the institution as a whole. The task of providing sanctions which deal with entire institutions is a much more difficult and in many cases more cumbersome one, than to deal with specific program offerings.

I have made the point before, but I repeat, the importance of our reviews by way of our concern for aid eligibility, both student and institutional in our State, our student assistance program, which is called the tuition assistance program, exceeds $300 million of State funds per year. We have a very great stake in that program and the eligibility of students to receive that, as well as for the Federal funds.

We have substantial institutional aids for both the independent sector and of course from the State budget for our State university and the city university. Once again, to assure the public interest with respect to these expenditures, this program control and review is extremely important.

There are two other recommendations in the Carnegie Foundation report which I want to indicate we would oppose, or we would suggest some modifications. These appear at pages 83 and 84.

The first has to do with a statement about the agencies which should be recognized by the Secretary of Education as accrediting agencies. The recommendation reads, and I quote: "In determining the eligibility of colleges to participate in Federal programs, the Secretary of Education should use regional accreditations as the basis for approval."

I would respectfully submit that on the basis of our experience and acknowledging that it is a unique experience, there is no other State that has quite the same role, the statement really should be "The Secretary of Education should use regional and appropriate State accreditation as the basis for approval."

The following recommendation, then, in the report is, "The preparation of an approved list of regional associations should be a function of the Council of Postsecondary Accreditation, not the Federal Government." I respectfully oppose that as well.

I believe that the function has been given to the Secretary because there is a very, very great public interest and I believe that the function should continue to remain with the Office of the Secretary.

In conclusion, may I note that on the experience, which again I emphasize is a unique one, of nearly 200 years of chartering, of program review, I believe that we have established a very strong case for an effective role in a State for an accrediting function by a State agency. I do submit that as you are deliberating on this issue, perhaps considering any changes in Federal statute with respect to the powers, that that role of a particular State be considered.

Indeed I would go a bit beyond that. Very intricate arrangements, as among the Federal level, the accrediting associations, regional or speciality, and the States, is an extremely important balance that must be maintained. I would submit that perhaps the experience of New York, where we have a certain division of those responsibilities, is one that might be considered as something of a model for other parts of the country.

Thank you very kindly for the opportunity to testify.

[The prepared statement of Gordon Ambach follows:]

PREPARED STATEMENT OF GORDON M. AMBACH, PRESIDENT, THE UNIVERSITY OF THE STATE OF NEW YORK, AND COMMISSIONER OF EDUCATION

I am Gordon M. Ambach, President of the University of the State of New York and Commissioner of Education, New York State Education Department.

I welcome this opportunity to present testimony on institutional accreditation. The first portion of my testimony outlines the history and framework of accreditation in New York State. The second section outlines the procedures and standards that are employed in New York. The third section addresses the recommendations of the Carnegie Foundation report, "The Control of the Campus--A Report of the Governance of Higher Education" that pertain to State agencies. In a brief conclusion I will summarize why New York has retained responsibility for accreditation and plans to continue in that role.

Background and History

Responsibility for providing and supervising education has resided constitutionally and traditionally with the states and their local jurisdictions. The statute that created the United States Department of Education states: "The establishment of the Department of Education shall not increase the authority of the Federal government over education or diminish the responsibility for education which is reserved to the States and the local school systems and other instrumentalities of the States."

The Board of Regents is responsible for education in New York. The Board was created by an act of the New York State Legislature in 1784 which invested the Board as governing body of the University of the State of New York. This University includes all educational institutions in New York and has a clear legislative mandate to supervise all education in the State through the State Education Department. Responsibility is authorized by the New York State Constitution and set forth explicitly in Education Law. The fifteen Regents of the Board are elected to overlapping, seven-year terms by action of the New York

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State Legislature. One member of the Board is from each of the State's eleven judicial districts and four are elected at large. They appoint the Commissioner of Education who, in turn, appoints staff. The programs and operations of the State Education Department are financed by appropriations in the State and Federal budgets. This system of governance and oversight is unique and is oriented solely to the public interest for the quality of education in New York.

The Board of Regents has been an accrediting agency since its inception in 1784 and for 199 years has been responsible for chartering educational institutions and approving academic programs. The Regents have been recognized as an accrediting agency by the United States Department of Education and previously by the United States Office of Education since 1952 when such recognition was first available. This recognition is based upon a review of the Regents policies and procedures for accreditation in relation to criteria of eligibility.

New York Education Law requires the Board of Regents, and the Education Department as its executive arm, to accredit all degree-granting institutions in the State. In addition, the Education Law requires the Regents to prepare a quadrennial Statewide Plan for Postsecondary Education, based upon the individual master plans of all degree-granting institutions--public, independent, and proprietary. The plan establishes the comprehensive framework for higher education in New York. This combination of responsibilities for planning and program review enables the Regents and Education Department to plan for excellence with the full involvement of all colleges and universities. Indeed, the 1980 Statewide Plan and the proposed 1984 Plan have as one of four principal goals the achievement of academic excellence. We are collaborating with the institutions to accomplish such objectives as: improving graduation rates without diluting standards; improving graduates' records of relevant job placement and admission to more advanced levels of study; enhancing library collections for instruction and research;

preserving the role of the liberal arts and sciences; expanding study of other languages and cultures; and fostering cooperation among schools, businesses and colleges to enhance the attractiveness and effectiveness of teaching in the elementary and secondary schools. Our pursuit of these aims, as well as our consideration of individual program proposals, would be weakened materially by the absence of one of the complementary roles of academic review and planning.

In summary, there is a long, unbroken and clear history of comprehensive responsibility for postsecondary education being vested in the Board of Regents and State Education Department in New York for almost two centuries.

Accreditation Procedures

The accreditation activities of the Regents and State Education Department focus on academic programs. There are some 15,000 registered programs (each program leads to an authorized degree) in nearly 250 degree-granting post-secondary institutions in New York. Approximately 500 new programs are proposed by the State's public, independent and proprietary institutions each year.

The standards for registration of programs are set forth in rules and regulations adopted by the Regents and have the force and effect of law. Proposed programs are evaluated against the standards by Department staff and by expert consultants drawn from colleges and universities in and outside New York. In those instances where an institution proposes a program that represents a significant new undertaking (for example, its first program in business or a new law school) the proposal review by staff and consultants is supplemented by a site visit to ascertain commitment, plans and the adequacy of resources. In those cases we also conduct a planning review that permits other institutions to register their views on the need for and likely effects of the proposed program.

The standards of quality bear on faculty, curriculum, administrative support, student services, land resources including classrooms, library collection and space, laboratories, equipment and an adequate financial base. They are put in general terms to permit variety, flexibility and contemporary peer judgment. These general standards are reviewed and revised periodically by the Board of Regents following consultation with a council of two dozen college presidents who advise my staff and me on a variety of matters affecting higher education. Moreover, there are provisions to waive these general requirements, if an institution wishes to propose a particularly innovative program.

If staff and consultants have questions or concerns about some element(s) of a proposal in relation to the standards, the proposing institution has ample opportunity to clarify and explain as well as to supplement. The essence of the review process, therefore, is to ensure equality without thwarting creativity; to preserve academic freedom while protecting the interest of students, their parents and employers, and the public.

Approximately every five years the Department conducts a visit to each degree-granting institution following a self-evalution by the college or university. The visiting team usually consists of one or two staff members and from two to six consultants from the academic community who are selected for their knowledge of particular fields to be reviewed and with careful attention to experience that is pertinent to the type and level of institution to be visited. The college has the opportunity to object to any of the proposed visitors. Here again, the general standards contained in rules and regulations provide the legal framework within which peer judgments are made. The site visits enable the evaluation of the institution's overall health but, in addition, permit special examination of such matters as off-campus instruction and remedial education--both of which have grown dramatically in recent years--and programs that were instituted since the

last visit and which were not evaluated on site when first proposed. Staff provides a draft site visit report to the college president for comments and corrections of fact, before a final report is made. In addition, there are due process safeguards for the institution if a program is found wanting.

Such accreditation or registration visits are coordinated with the visits of the regional accrediting body, the Middle States Association, and with those of specialized accrediting organizations wherever possible, in order to reduce the burdens upon the institutions and to capitalize on the competence of the teams assembled by other accrediting bodies.

Our coordination with the Middle States Association is efficient and economical and our relationship with Middle States in this process is excellent. In fact, the Middle States Association was chartered by the Board of Regents. Nonetheless, all of our needs cannot be met nor all of our responsibilities discharged by relying on their accreditation activities. Barring significant problems, visits by the regional associations are scheduled at ten year intervals. Although periodic reporting requirements may be employed, the visits are too infrequent for our Department to be confident that changing institutional circumstances in such areas as leadership, financial strength, nature and size of enrollments and locations of instruction have not altered significantly the quality of a college or university's offerings. Several colleges have proposed first baccalaureate or graduate degree programs, new professional schools and new branch campuses in just the past few months in New York. The Regents and Department cannot wait years before conducting an appropriately searching review of such proposed initiatives.

New York State has an extensive set of State programs of financial assistance to postsecondary institutions and students (perhaps, the most extensive array in the nation). The confidence of the Governor, State Legislature and public

in New York of the value of these aid programs is based in large part on the quality control of the reviews and accreditation we conduct to establish institutional eligibility.

The Board of Regents and Education Department also have responsibility for all public and non-public elementary and secondary education in New York. At this time when there is considerable experimentation on the most effective dividing points and relationships between the postsecondary and secondary institutions, it is especially important to maintain an effective control of program quality for both sectors at our State level.

It must also be borne in mind that regional accreditation is voluntary: not all institutions in New York have or seek it including an institution such as Rockefeller University. Without the accreditation of the Regents, this nationally prestigious institution would be ineligible for Federal aid.

One other most valuable attribute of our accreditation role is the ability to regulate out-of-State institutions that seek to offer instruction for college credit in New York. The Department's statute-based activities and control of this area have prevented diploma mills from operating in New York.

Carnegie Report Recommendations

The Carnegie Foundation report, The Control of the Campus, makes six recommendations with respect to state activities in higher education (page 81) and two related recommendations on accreditation (pages 83-84). We endorse five of the first set of recommendations, those relating to: planning and providing basic support for a comprehensive system of higher education; encouraging good management by permitting administrative decisions to be made close to the locus of implementation; creating broad categories of expenditures; fostering close relationships with regional accreditors; and promoting diversity. The Board of Regents and

State Education Department have taken many steps to promote diversity, nurture a comprehensive system of postsecondary education and develop close ties to the Middle States Association. We have also encouraged the maximum degree of management flexibility for our colleges and universities that is consistent with protection of the public interest. Our most recent statement on this issue, included in our bulletin calling for the 1984 Statewide Plan for Postsecondary Education, has this observation:

> Continuing economic austerity and rapidly shifting academic goals have combined to create a requirement for greater management flexibility in our public and independent institutions of higher education. In the academic area, the need is for more freedom from undue constraints from governmental and voluntary accrediting authorities, without abandoning the goals of quality and responsible performance those constraints were intended to protect. In the fiscal area, the need is to permit flexible use of government funds in a period of scarce resources while preserving accountability and responsiveness to the intent of the (State) Legislature, the Governor, and/or the Congress in allocating public funds.

I want to emphasize that the Regents and Education Department do not review the budgets of public colleges and universities as do higher education agencies in many other states nor, of course, do we review the budgets of independent institutions. There is no commingling of budgetary and program review responsibilities by our agency.

We oppose one recommendation in the report (at page 81) bearing on state activity because it is contrary to our experience and practice. The recommendation reads, in part: "State officials should not involve themselves directly in the review of academic programs." The report recommendation is based on a concern

expressed earlier in the report about the preservation of "the four essential freedoms of a university: to determine for itself on academic grounds who may teach, what may be taught, how it shall be taught, and who may be admitted to study." (Sweezy v. New Hampshire)

As described earlier, the New York State Education Department reviews academic programs to ensure adherence to State standards of quality. We do not, however, define course or program content, or determine who shall be faculty members and how they shall teach. Nor do we make admissions policies or decisions. We are very conscious of the important and delicate balance between public interest and academic freedom. We believe that the State Education Department role in academic review has not compromised academic freedom in the institutions while it has promoted quality. One of the areas of most rigorous review has been our ten year project of reviewing Doctoral programs, field by field. This has been done with strong institutional support. New York institutions have not been impeded in operation because of such reviews as may be seen by the results of the reputational study of doctoral program quality conducted by the Conference Board of Associated Research Councils.

The Regents and Department review individual programs rather than accredit overall institutions. This approach enables consideration of proposed new programs before students are admitted. While some institutions conduct searching reviews before starting programs and often engage outside consultants, others do not. Institutions sometime respond too quickly to perceived competitive pressures from neighboring institutions without providing the planning and resources that will yield a sound program. An objective review in advance of a program can avoid many subsequent problems for students, faculty and others.

A second advantage of program-by-program review is the ability to focus on parts of an institution's offerings, and either require change or deletion of a program without jeopardizing the entire institution.

A third reason for review of individual programs pertains to the $300 million Tuition Assistance Program (TAP) and other student and institutional aids offered by New York. TAP is by far the largest program of State-funded student aid for higher education in the nation. By State law, student eligibility relates in part to enrollment in a program as registered by our Department, not merely in an accredited institution.

In summary, the State review of programs has provided a carefully focused control without intervention in institution choices of faculty or courses.

We oppose also two of the recommendations on Federal action with respect to accreditation (pages 83-84).

For the reasons just provided in support of our State accrediting responsibility, we oppose the limit in the following recommendation: "In determining the eligibility of colleges to participate in federation programs, the Secretary of Education should use regional accreditations as the basis for approval." The recommendation should read "...The Secretary of Education should use regional and appropriate State accreditation as the basis for approval."

The next recommendation of the report: "The preparation of an approved list of regional associations should be a function of the Council of Postsecondary Accreditation, not the federal government" is opposed also. We find no logic in removing this responsibility from the Secretary who must, in turn, assure the Congress, President and public interest of a prudent expenditure of billions of dollars in government aid. The Secretary's power to establish determination of the list of accrediting agencies should not be reassigned.

Conclusion

In the letter of invitation to testify, Congressman Simon asked why New York has retained the responsibility to accredit its colleges and universities. As the

foregoing testimony indicates, there is a nearly 200 year history of responsibility for accreditation assigned by constitution and statute to the Board of Regents and the State Education Department. The exercise of that responsibility is made possible by nearly $2 million of State funds appropriated annually by the Legislature upon recommendation of the Governor for conduct of program accreditation activities. This substantial commitment of resources is rooted in the belief that the assurance of educational quality in all of New York's colleges and universities--public, independent and proprietary--is a legitimate right and responsibility of the State government in order to protect students and those who have an interest in their receiving a sound education. The latter includes the general public which support programs of students and institutional aid and needs a capable and well-educated citizenry to foster economic growth and to promote social and civic responsibility.

Other states may be unable or unwilling to commit the effort and resources to accreditation. New York has the benefit of tradition and experience and a broadly shared commitment to a quality of education which is to be maintained in all institutions through the oversight of State agencies. We are certain this commitment will continue, and we urge that the Congress and Federal administration support this State practice and take no action which might disrupt its effectiveness.

Mr. SIMON. Thank you. You are here wearing two hats, so to speak. If I can ask you to put on your hat as president of the University of the State of New York, do you find the present accreditation process is—let me specifically cite Commissioner Boyer's experience in your State in which he said that one of the accrediting agencies accredited by the national associations, I forget which one it was, came to him and he had rejected having two associate deans because it looked like in that school one associate dean was plenty. They came to him and said, if you do not have two associate deans, you are going to lose your accreditation with the national, whatever it was, association.

Mr. AMBACH. That was probably a specialty review, then, other than the regional.

Mr. SIMON. Yes, that is correct.

Now, is this a problem that you have confronted and is there any sense in the Federal Government accrediting the journalism group or some of the more specialized accrediting groups like the business schools association? I am not talking about the proprietary school because it seems to me there are these broad, general categories where clearly we have to be involved. But the journalism schools and that sort of thing, I would be interested in your comments and reflections.

Mr. AMBACH. May I speak specifically, of course, about our role, and you are asking about a dual role. Perhaps it sounds like a dual role, the president of a university and Commissioner of Education. It is, in fact, one and the same role. The two titles have to do with the fact that all institutions in our State are a part of the University of the State of New York by their charters. We do not directly operate them, but they are a part of that.

That is where the presidency title comes from. The commissioner title is as the chief executive officer of the education department in our State with responsibility for all levels.

Mr. SIMON. That includes, just so I understand, that you are in theory the head of Fordham University in the private as well as the public?

Mr. AMBACH. That is correct. Not the head of Fordham.

Mr. SIMON. I understand.

Mr. AMBACH. It has a president, as do all of the other 250 institutions, but in our concept, which again goes back some 200 years and modeled somewhat after the French experience of the university, there is an all-compassing educational concern and interest that the State has. It is expressed in our State in an entity which we call the University of the State of New York.

Mr. SIMON. I did not realize that.

Mr. AMBACH. I serve as the president of that. And in that sense, because Fordham or NYU or Columbia or Syracuse or Rochester are all parts of the university chartered by us, and in a sense, under the aegis of the board of regents, indeed I am, in a certain role, responsible for the activities that go on in those institutions.

That power, incidentally, is to such an extent that the board of regents in the State of New York may remove the board of trustees of any of those institutions for cause. That gives you a sense of how deeply this kind of authority is rooted.

Now, coming back specifically to your concern about the multitude of accreditations, or the very specific recommendations that are made, from time to time there are, of course, disputes as to what the specificity shall be. I think those tend to occur perhaps more in the specialty accreditations than they do with the regional accreditations.

We attempt to have a very close fit between our own reviews and either the regional or the specialty accreditations. Of course, we try to minimize what would be a dispute over an issue which we would consider is not the kind of issue that should be dealt with.

We do not, for example, in our standards, have specific numbers of this or numbers of that. We rely very heavily on peer judgment and we rely on a general statement with respect to what should be the appropriate approach to the curriculum, what should be the general offerings, and what should be the quality of the faculty and the resources.

I think that your questions lead toward the issue of whether there should be some significant change at the Federal level on the Secretary's role here. I would submit that in order that there be an assurance of a level of quality of performance for the expenditure of Federal funds, whether they be in institutional or whether they be in student assistance form, you must have some kind of a way in order to have determinations made that there is a consistency of quality, that there are standards to be met throughout the country.

The practice of doing that, since 1952 at any rate, has been a mixed role, the Secretary identifies which accrediting agencies, which in turn provide the fields of approval on the institutions that are eligible. I would submit that, given our own experience, and with the inclusiveness of our experience, that this general pattern of a role and maintaining the Secretary's responsibility, I think has to be there for the Congress and for the public as a whole in this Nation to feel secure in quality control. I think generally speaking, that is a system which works and should continue to work, as I said in my opening remarks.

Mr. SIMON. While you endorse five of the six recommendations, fundamentally, when you say this system works, is the system working well enough that this subcommittee and this Congress really need not worry that much about it, or is it that substantial improvements need to be made?

Mr. AMBACH. I am not suggesting that. I am trying to address the very specific point which is, I think, the pivotal point with respect to the administration of Federal programs. I would like to emphasize that I am addressing that very, very specifically. You must have some satisfactory arrangement through which a multitude of institutions can be provided with an opportunity to participate in the Federal programs, and yet on the other hand, you have the assurance that there is a system in place to guarantee a quality of performance so that the money is well spent.

Now, that, I think, is one issue. I believe your question now is going beyond to the foundation report which has to do with the strengthening of the overall accreditation system.

I would make this point with respect to that question. I am not sure that it would be Federal action or that it would be a Federal statute or provisions coming either through legislation or rules

from the Office of the Secretary that would necessarily lead to any more effective system being in place.

I think the Federal role should be to provide an assurance for what is Federal expenditure well guarded. I think that beyond that, the issue is changing accreditation procedures, and I would agree with you, there are some significant changes to be made. There are things to tighten up in the system with respect to self-review, with the process of the peer reviews, with an overall commitment by the institutions and the lead institution that they are involved in their own self-review and the peer review. Indeed, there are things that should be changed, but I am not sure that those should be changed by way of a Federal action.

Mr. SIMON. Thank you.

Mr. Harrison.

Mr. HARRISON. Just because the system in New York is so unique, and I confess that I am not that familiar with it, I have one question which may seem naive. Do I understand, Doctor, that it is simply not permissible for an institution to offer a course for credit in New York that has not been approved by the University of the State of New York?

Mr. AMBACH. That is correct.

Mr. HARRISON. And the process by which you give this approval is your accrediting process, and as I think you said, you have 150,000 courses for credit which are offered in the State—15,000, I am sorry, take that zero out.

Mr. AMBACH. 15,000. The 250 different institutions, public and independent, some proprietary, together, collectively, now offer 15,000 different programs. Each one of those programs leads to a specific degree. In order for any of those programs to come into being, there must be an explicit approval by my agency, that is correct.

This is a very unique system in our country, and indeed, once those programs are put in place, then our process, of course, is to review and to assure that there is quality maintained. We have done that in some very particular ways, one I referred to in the written statement but did not comment on here. In the course of the last decade, we have had an extensive review of the doctoral programs offered by the several institutions within our State, field-by-field. So all those institutions, for example, offering a doctoral program in history, in economics, have been reviewed from peers from outside of the State at one time.

As a result of that process, we have had our institutions in many cases actually changing, dropping certain of their programs, consolidating them and carrying through, I think very responsibly, with our assistance and with our direction, on assuring that wherever there is a doctoral program in the State, it meets those very rigorous standards of quality.

Mr. HARRISON. Is it your concern that if you did not have this comprehensive system that you have described that you might have a proliferation of what you have called diploma mills?

Mr. AMBACH. That is always possible. The controls, both from within our State and because we have that control on who can begin in the first instance, we have been able to keep a very tight control on the potential operation of diploma mills from within the

State. But beyond that, we have a very strong control that any diploma mill that may be operating from another State that tries to do business within New York, we can stop immediately, and have in the past done so.

Mr. HARRISON. Very good. I am also glad to know that the Jesuits are still running Fordham under your supervision.

Thank you, Mr. Chairman.

Mr. SIMON. We thank you very, very much, Dr. Ambach, for your testimony.

Mr. AMBACH. Thank you very much.

Mr. SIMON. We shall keep it in mind. I will submit questions for the record, and would appreciate a response.

[Information referred to above follows:]

QUESTIONS FOR DR. GORDON AMBACH

1. Since New York is, to my knowledge, the state with the most extensive accreditation process, it would appear that other states do not feel that state accreditation is necessary. What impact do you feel it would have if your state no longer accredited institutions?

2. During your accreditation and review process do you evaluate the fiscal responsibility shown by institutions such as default rates on student loans? Do schools ever lose accreditation for that reason?

3. Can you give us a percentage on how many schools that apply for accreditation receive it? How many schools lose accreditation during your review process?

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THE UNIVERSITY OF THE STATE OF NEW YORK
THE STATE EDUCATION DEPARTMENT
OFFICE OF THE PRESIDENT OF THE UNIVERSITY
AND COMMISSIONER OF EDUCATION
ALBANY, NEW YORK 12234

March 10, 1983

Dear Congressman Simon:

I am writing in response to your letter of February 23, 1983, in which you pose several questions concerning the accreditation activities of the New York State Board of Regents and its administrative agency, the State Education Department. I will respond to the questions in the same order as you listed them.

(1)

You are correct in your understanding that the accreditation process in New York State is more extensive than that of other states. That is explained, in part, by the unique history and scope of educational and professional governance that is represented by the Board of Regents, as stated in my testimony of February 10. The cessation of accreditation activities by this Department could only impact negatively on the quality of education in New York State.

Unlike the regional agencies which grant or withdraw accreditation on an institutional basis, the Department reviews and accredits individual programs. As you may recall from my testimony, this process involves criteria which are not addressed by the regional agencies. The benefits derived from this approach include the ability to require an institution to correct deficiencies identified during the review process or discontinue the programs involved and to assess the quality of new programs before the institution begins to offer them. An example of the latter would be a proposal for a new program in microcomputer information science recently submitted by an upstate independent college. Our review of the proposal identified a number of serious deficiencies, including the lack of the necessary mathematics foundation, inadequate faculty background and training in computer science, unsatisfactory equipment and library resources, and insufficient financial support. Because of these problems the Department recommended that

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the college withdraw the proposal. If the college were located in another state without similar accreditation functions, it would have been able to offer to students a seriously deficient academic program which could not have delivered the services it promised. Inasmuch as the last regional accreditation visit to that institution occurred last year, there would not have been an on-site review of that program until 1992.

Examples could also be cited relating to initial offerings of baccalaureate, master's or doctoral degrees, new professional schools or new branch campuses. In all such cases, a review in advance is necessary to protect the public. Regional and specialized accrediting agencies usually require that new institutions be in operation for a period of time before they are evaluated for accreditation. If these agencies held total responsibility for the accreditation of new institutions, the people of the State and the students enrolled at the institutions would be required to wait for a determination as to the quality of the education being offered.

Accreditation by regional and specialized agencies is voluntary. If New York were to discontinue its process of accrediting institutions and rely instead on other agencies, there would be no means of ensuring that "degree-mills" were prohibited from operating within our borders. In addition, institutions of quality which lack accreditation by one of these agencies or choose not to seek it would find themselves ineligible for Federal aid.

(2)

In response to your second question, the Department is aware of the default rates on student loans at each institution because we receive such information from the State's Higher Education Services Corporation, the agency responsible for processing student loans, grants and scholarships. This issue, however, is not addressed in our accreditation and review process, which is concerned primarily with academic issues. We would not, therefore, withdraw accreditation on the basis of default rates.

Our Department and the Board of Regents have a significant interest on behalf of the State, for the financial condition of each degree granting institution. Should an institution have an exceptional default rate or should the default rate impact on the financial health of an institution, we would review the circumstances and could take action, if appropriate.

(3)

New York State Education Law prohibits any degree-granting institution from operating in the State until it has been authorized to do so by the Regents and its programs have been registered by the Department. The Department receives a large number of requests each year for information concerning the requirements necessary to establish a new degree-granting institution. Because of the high standards required of New York State degree-granting institutions, few of these requests result in a formal proposal for degree powers. Of those that do, the Department works with the institution in advance of an application to determine if the resources and expertise exist to offer programs of quality. If it is apparent that the institution will not be able to meet the required standards, it will be advised to withdraw the proposal without prejudice. We do not keep a formal record of applications versus approvals. In the past three years only three institutions received degree powers for the first time. Each of these institutions had been operating for some years as a proprietary business school licensed by this Department but not authorized to issue degrees.

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With respect to the second portion of that final question, there is seldom an instance where accreditation is withdrawn from an entire institution. This, again, is attributable to our practice of registering individual programs. In two instances within the past five years we withdrew accreditation of the entire institution. Both involved highly specialized institutions offering only a few programs. Because the deficiencies identified during our review involved all the programs and the institutions were not able to submit adequate plans to address these issues, we required them to discontinue the programs. In such instances, the Department works closely with the institutions to ensure that provisions are made to enable students to complete their studies.

If deficiencies are identified in a program during the course of our review, our procedures require that the institution be given the opportunity to correct them before accreditation is withdrawn. The institution is asked to submit a plan explaining how each issue will be addressed. If the plan is found to be adequate, the Department will continue the program's registration on a conditional basis. The institution is required to submit periodic progress reports to the Department and an additional site visit is conducted to verify that the problems have been corrected.

It is appropriate to note here that the New York State Board of Regents is conducting an evaluation of all doctoral programs in public and private institutions by major subject area to encourage academic excellence and to ensure a comprehensive, high quality system of doctoral education. The procedure for doctoral review is a unique process which involves peer review, due process, and evenhanded evaluation of all programs from a statewide perspective. The purpose of the Doctoral Project is to identify and maintain programs that meet quality standards and improve or phase out those that do not. The review process involves out-of-State experts who serve on rating committees and as site visitors and in-State leaders in graduate education who serve on the Commissioner's advisory board on doctoral education. Throughout the review process, institutions have opportunity to respond to findings and recommendations on their doctoral programs. This comprehensive and rigorous review process has identified many programs of high quality. It has also resulted in significant program improvements and in a substantial number of program consolidations and voluntary closings where insufficient resources or serious deficiencies were apparent. New York State's strong commitment to this cooperative review effort ensures that the State's resources are being allocated to support doctoral education of high quality.

I hope this information is of assistance to you. If the Subcommittee on Postsecondary Education has any further questions, please feel free to contact me.

Sincerely,

Gordon M. Ambach

The Honorable Paul Simon
Chairman
House Subcommittee on Postsecondary Education
320 Cannon House Office Building
Washington, D.C. 20515

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Mr. SIMON. Next we will have a panel composed of Dr. Gordon Sweet, who is going to be accompanied by Dr. Whisenton and Dr. Carpenter; Dr. Thurston Manning; and Dr. James Phillips, who will be accompanied by Dr. Robert Kline, and an old friend, Bill Clohan.

Frank, I am going to turn this over to you.

Mr. HARRISON [presiding]. Gentlemen, just let me say that I have been a part-time teacher in a number of colleges over the years, most recently in my own alma mater of Kings College for the 13 years before they gave me this job, and so I consider it quite an honor that the first time I get to chair anything around here is to be in this particular committee room and to have in front of us such an impressive array of academic talent. Normally, it is the administrators who are telling the teachers what to do, so I am glad to be on this side of the microphone for a few minutes.

With that in mind, I think we should turn it over to you and ask you to proceed as you think best.

STATEMENT OF GORDON W. SWEET, EXECUTIVE DIRECTOR, COMMISSION ON COLLEGES OF THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS, ACCOMPANIED BY JOFFRE T. WHISENTON, ASSOCIATE EXECUTIVE SECRETARY, COMMISSION ON COLLEGES; AND THOMAS CARPENTER, PRESIDENT, MEMPHIS STATE UNIVERSITY

Mr. SWEET. Thank you. Honorable members of the Subcommittee on Postsecondary Education, Mr. Chairman, and counsel, I am Gordon Sweet, executive director of the Commission on Colleges of the Southern Association of Colleges and Schools. The Commission on Colleges accredits degree-granting, postsecondary institutions in the South and I am pleased to represent our 723 member colleges before this committee.

As you already noted, Mr. Chairman, with me are Thomas Carpenter, chairman of the Commission on Colleges of the Southern Assocation and president of Memphis State University; and my associate Joffre Whisenton.

Mr. Simon asked that I discuss the role and function of regional accreditation and to comment on the recent report of the Carnegie Foundation for the Advancement of Teaching entitled "The Control of the Campus: A Report on the Governance of Higher Education."

I would like first to offer some general comments concerning regional accreditation, then describe how the Commission on Colleges functions in the South, and conclude with reactions to the Carnegie report. Regional accrediting associations have assigned the task of accrediting postsecondary institutions to commissions.

The work of the Regional Accrediting Commission on Postsecondary Education has traditionally focused on two important objectives: The maintenance of minimum standards of quality in postsecondary education, and the stimulation of institutions to become more effective through self-study and examination.

For the Regional Accrediting Commission on Postsecondary Education, the work of developing standards and procedures for accreditation does not proceed independent of society or the consumer of educational services. Changes in technology and methods in

business and the professions create new demands and legitimate pressures for changes in the curricula for our institutions, as well as in the mode of delivery of educational services.

Changes in the standards and procedures of the Regional Accrediting Commission are not made capriciously, they are accomplished only after intense study and discussion within the academic community and approval by the membership.

In a sense, the Regional Accrediting Commission helped to legitimatize and rationalize changes in postsecondary education, performing a service for the academic community and society as a whole.

The intent is to maintain standards of quality while at the same time encouraging the flexibility which has been a major strength of the American system of postsecondary education. The Southern Association of Colleges and Schools is a nonprofit corporation chartered in Georgia, which conducts accrediting activities within a geographical region that includes Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia.

Institutions of postsecondary education are accredited by the Commission on Colleges, which accredits degree-granting, postsecondary institutions and by the Commission on Occupational Institutions, which accredits nondegree-granting occupational educational institutions. The number of member institutions accredited by the Commission on Colleges, as I said, now stands at 723.

Of the 723 colleges accredited by the Commission on Colleges, 435 are public and 288 are private institutions. Including in our membership are 77 historically black institutions. The total enrollment of our member institutions is 2,514,854.

The validity and equity of the accreditation process of the Commission depends in large part on that level of review which is carried out by the visiting evaluation committee. The philosophy of the Commission on Colleges has been to involve as many faculty members and administrators from as many institutions as possible in the evaluation process.

We have developed a list of approximately 4,700 evaluators who are available for service on our committees. They currently represent 688 institutions in our region. These peer volunteers are the real strength of our regional accreditation.

We have been asked to provide our reaction to the findings contained in the Carnegie Foundation report on the governance of higher education. The major conclusion of the report is clear: The academic community must assume primary responsibility for its own regulation if quality and independence are to be characteristics of our postsecondary institutions.

We agree that the academic community must be responsible for its own regulation and it is this aspect of the report that intimately involves our work in regional accreditation.

Certainly, the presidents of our member institutions would conclude that there has been a diminution of institutional independence as a result of the actions of State governments, the Federal Government, and the courts.

The Commission on Colleges has defended the autonomy of member institutions many times in the past, usually as a result of

the actions of a Governor or a State legislator. These were characteristically dramatic instances. An action by the commission was an important factor in resolving the difficulties.

The challenge in our recent situation, however, is to defend our institutions against the accumulation of less dramatic intrusions. Those recommendations in the Carnegie report pertaining to the role of college governing boards, we support fully.

Governing boards have an important duty in protecting institutional autonomy. Our own standards of the Commission on Colleges call for the governing board to protect the college administration from undue pressure from political or religious bodies.

The Carnegie report recommends that the preparation of an approved list of regional associations be a function of the Council on Postsecondary Education, not the Federal Government. We concur and hope that much of the recognition of COPA could be utilized by the Secretary of Education.

COPA is not without its imperfections; neither are its constituent members. It does, however, utilize a recognition process, the validity of which includes the participation of not only those in accrediting, but by persons representing national postsecondary educational organizations and the public.

The Carnegie report views regional accreditation as a critically important part of academic governance and recommends that officials at all colleges should fully support the regional associations. We welcome and support this recommendation.

It implies, however, that regional accrediting associations currently lack support from the academic community. We have not found this to be the case. Administrators and faculty members from our institutions value the process and consider serving on visiting committees and on the Commission on Colleges a significant means of professional development, as well as a responsibility.

During 1982, 130 committees, with a total of 880 evaluators, visited candidate, member, or applying institutions. These evaluators were drawn from 378 institutions.

The Commission on Colleges is currently in the process of revising all of its standards and procedures to give increased emphasis to institutional planning and the assessment of student outcome. It began 2 years ago with a survey of over 2,600 individuals connected with higher education, and will culminate with a vote of the entire membership in December of this year.

The Carnegie report states that regional accrediting associations should expand the scope of their authority and hold colleges accountable for good management, consumer protection, and affirmative action. We believe that we are at present holding colleges responsible for good management, not only of human resources, but of physical and financial resources as well.

Management, as it affects quality, is a primary concern in the evaluation process. We also believe that the most desirable consumer protection we can provide is to help insure that students receive a quality education and that institutions accurately describe to students the nature of the college and what is to be expected of both parties to the educational process.

It is not desirable, and probably would be impossible for regional accrediting associations to become involved in the intricacies of enforcing the multitude of government regulations and guidelines.

There are few in postsecondary education who would desire to see regional accrediting associations become a policing arm of government.

The final recommendation on which we would like to comment is the proposal that a court of last resort be organized by COPA to hear an appeal from an institution which believes that it has been unfairly treated by a regional association. We believe this to be unnecessary because each regional commission has an adequate appeals procedure, a requirement for COPA recognition. COPA also solicits third-party testimony as part of the appeals process.

In conclusion, I would like to say that regional accreditation is a highly coveted status for postsecondary institutions. Not only is it desirable for reasons of prestige, because it is an important consideration when a student selects a college to attend, it facilitates the transfer of credits and the admission of students to institutions of higher education levels, it gives guidance to employers who not only hire graduates, but in many instances pay tuition for their employees. It is relied on by the Veterans' Administration and the military services in the funding of tuition. It is linked to institutional eligibility for Federal funding and it influences the funding decision of foundations.

It has been a pleasure to give you this testimony. I am always enthusiastic when I have an opportunity to comment on regional accrediting and what it has meant and continues to mean to postsecondary education.

[Prepared statement of Gordon Sweet follows:]

PREPARED STATEMENT OF GORDON SWEET, EXECUTIVE DIRECTOR, COMMISSION ON COLLEGES OF THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS

I am Gordon Sweet, Executive Director of the Commission on Colleges of the Southern Association of Colleges and Schools. The Commission on Colleges accredits degree-granting postsecondary institutions in the South and I am pleased to represent our 723 member colleges before this Committee.

I have been asked to discuss the role and function of regional accreditation and to comment on the recent report of the Carnegie Foundation for the Advancement of Teaching entitled "The Control of the Campus: A Report on the Governance of Higher Education." I would like first to offer some general comments concerning regional accreditation, then describe how the Commission on Colleges functions in the South, and conclude with reactions to the Carnegie report.

To aid in understanding where we are at present it is helpful to review briefly the unique history of regional accrediting. Regional accreditation had its origins in the rapid societal changes which took place in the United States of the immediate Post-Civil War period. Higher education was expanding: hundreds of new colleges were created. But there was little uniformity or definition of a college in terms of admission standards, curriculum, and length of study. The situation had become what some educators termed chaotic. Business, industry, and the professions were unsure of the competence of the college graduates they desired to employ, and students who wanted to attend college had little guidance.

The formation of regional accrediting associations in the period 1885 to 1895 helped to bring order to this situation. The four regional

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accrediting associations founded during this period -- the Southern Association of Colleges and Schools in 1895 -- and those founded later were similar in nature. They were and have remained voluntary, private, and non-profit, and accredit institutions, not specific programs. The strong feeling against governmental regulatory action, expecially in regard to education, made a voluntary accrediting organization the natural vehicle to achieve a measure of uniformity and order in postsecondary education. The fact that they are organized regionally has enabled them to escape the possible bias and provincialism of local or state organizations and, at the same time, to respond to regional trends and needs. Cooperation and consultation among the regional accrediting associations, however, has existed from the early years both on an informal and a formal basis.

Regional accrediting associations have always been membership organizations. Each accredited institution is a member and has the opportunity to play a part in the development of standards and in the accreditng process itself. By relying on volunteers from the postsecondary education community in carrying out the work of accreditation, regional accrediting associations can not only utilize those persons outstanding in the academic community, but can also operate with small staffs and thus avoid an encumbering bureaucracy.

Regional accrediting associations have assigned the task of accrediting postsecondary institutions to commissions. The work of the regional accrediting commissions on postsecondary education has traditionally focused on two important objectives: the maintenance of minimum standards of quality in postsecondary education and the stimulation of institutions to become more effective through self-study and examination. In discussing the maintenance of minimum standards of quality it must be recognized that many of the characteristics of a college which we take for granted today were shaped

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by the regional associations, along with such organizations as the Carnegie Foundation for the Advancement of Teaching and the Association of American Universities, as they worked to define those elements which should be present for a college to be accredited as meeting minimum quality standards. Among these elements, for example, is the standard four-year undergraduate curriculum.

Defining essential elements of a quality education has been a difficult task through the years. It is, however, a crucial task and one that is most effectively done by the academic community, with appropriate consideration for the needs of students, business, industry, and the professions. The standards of all regional accrediting commissions have been revised many times through the years to respond to changing needs and practices in postsecondary education.

For the regional accrediting commission on postsecondary education, the work of developing standards and procedures for accreditation does not proceed independent of society or the consumer of educational services. Changes in the technology and methods in business and the professions create new demands and legitimate pressures for changes in the curricula for our institutions, or perhaps in the mode of delivery of educational services. Curricula and methods of teaching appropriate twenty-five years ago may not be adequate to meet the needs of today. These societal pressures are desirable: they prod our institutions to respond. Regional accrediting commissions, relying on the academic community's perceptions of, and responses to these changes, make adjustments in standards and procedures. But changes in the standards and procedures of the regional accrediting commissions are not made capriciously. They are accomplished only after intense study and discussion within the academic community and approval by the membership. The crucial concern in all

revisions of standards has been to maintain quality in our colleges and universities. This is done by incorporating in the standards current commonly-accepted elements of good educational practice, and also by designing the standards in such manner that they accomodate the future in allowing for beneficial changes to take place. In a sense the regional accrediting commissions help to legitimize and rationalize changes in postsecondary education, performing a service for the academic community and society as a whole. The intent is to maintain standards of quality, while at the same time encouraging the flexibility which has been a major strength of the American system of postsecondary education.

I have mentioned legitimate pressures from society which result in desirable change. There are also occasions when postsecondary institutions have been subjected to outside interference in their internal affairs. Regional accrediting commissions have served in the past to protect institutions from political interference. Their ability to do this is enhanced because of their nongovernmental nature and the fact that they are regional in scope and not subject to possible pressure from any one state government.

The other major goal of regional accrediting commissions is to increase the effectiveness of institutions through the self-study process. It is not sufficient for an institution to be meeting the standards of the regional accrediting commission. Periodically, institutions must conduct an intensive institutional self-study, a study which analyses the strengths and weaknesses of the institution and produces recommendations for remedying weaknesses and building on strengths. In essence a self-study becomes a planning document for the institution and a tool for significant institutional improvement. The adequacy of the self-study is an important consideration when an institution presents itself for reaffirmation of accreditation.

The Southern Association of Colleges and Schools is a nonprofit corporation chartered in Georgia which conducts accrediting activities within a geographical region that includes Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, and Virginia. Corporate powers are vested in a Board of Trustees whose members include representatives from the various commissions of the Association, and representatives from the public. The Southern Association of Colleges and Schools accredits elementary and secondary schools through two commissions: the Commission on Elementary Schools and the Commission on Secondary Schools.

Institutions of postsecondary education are accredited by the Commission on Colleges, which accredits degree-granting postsecondary institutions, and by the Commission on Occupational Education Institutions which accredits nondegree-granting occupational education institutions. The number of member institutions accredited by the Commission on Colleges stands at 723, and 214 are accredited by the Commission on Occupational Education Institutions. Of the 723 colleges accredited by the Commission on Colleges, 435 are public and 288 are private institutions. The following is a breakdown by level: 320 institutions are accredited to offer the associate degree; 166 the bachelor's degree; 126 the bachelor's and master's degrees; 92 the bachelors, master's and doctor's degrees; and 19 offer graduate and professional degrees only. Included in our membership are 77 historically Black institutions. The total enrollment of our member institutions is 2,514,854.

Each member degree-granting institution is entitled to one vote in the College Delegate Assembly of the Commission on Colleges. The College Delegate Assembly is the body which approves all changes in the standards for accreditation. The College Delegate Assembly elects the 66 members of the Commission on Colleges, which oversees the work of accrediting, according to the following formula:

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1. Two persons from each state and six persons at large, all connected with member institutions which offer bachelor's, master's professional, or doctor's degrees.

2. Fifteen persons connected with member institutions which offer associated degrees.

3. One person connected with a member elementary or secondary school from each state.

4. Five persons from the region representing the lay public.

5. Seven persons elected at large from member institutions.

Members of the Commission on Colleges are elected for terms of three years. The formula for membership on the Commission on Colleges provides for wide representation of: institutions by state, and at all degree levels; by elementary and secondary school representatives; and by the lay public. Provision for rotation ensures that a large number of educators become intimately involved in the accreditation process.

Duties of the 66-member Commission on Colleges include: preparing the standards for membership subject to approval by the College Delegate Assembly, taking final action on the accreditation of collegiate institutions, authorizing visits and investigations, and appointing special committees. The Commission on Colleges acts on policy matters not related to changes in the standards. An Executive Council of nine members is elected by the Commission and acts for the Commission when it is not in session.

Each of the members of the Commission on Colleges is a volunteer and is paid only expenses. Each serves on either the Standards and Report Committee for institutions offering the associate degree or the Standards and Reports Committee for those offering degrees above the associate.

Information and reports concerning member and applying institutions are submitted to these committees. For an institution which has no status with the Commission on Colleges the following procedures apply in seeking Candidate for Accreditation status, the first phase of the accreditation process.

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1. The chief executive officer of the institution interested in accreditation writes the Executive Director of the Commission declaring the institution's intent to be recognized as a Candidate for Accreditation. The institution must provide documentation of compliance with the Commission's Conditions of Eligibility.

2. An Application Form is then prepared by the institution. This report describes institutional characteristics and resources. If the report appears adequate a staff member will visit the institution.

3. A candidate committee may be authorized by the appropriate Committee on Standards and Reports. The candidate committee visits the institution and reports to the Committee on Standards and Reports on the institution's potential for achieving accreditation within a reasonable time. The Committee on Standards and Reports may recommend to the Executive Council that the institution be granted "Candidate for Accreditation" status. If the Commission on Colleges approves a favorable recommendation from the Executive Council the institution is made a Candidate.

4. Candidates for Accreditation are required to file annual reports and be visited by a staff member.

5. At two-year intervals a Commission committee visits the institution to determine if Candidate status should be renewed.

After achieving Candidate status the next step is for the institution to apply for initial accreditation. The following procedures apply:

1. Candidate institutions may apply for accreditation status after one year. They are not allowed to remain in Candidate status beyond six years. If they are not granted an evaluation committee for accreditation during this period, they are dropped from candidate status.

2. When an institution decides to seek accreditation status, its updated application form will be reviewed by the Committee on Standards and Reports and an evaluation committee for initial accreditation may be authorized.

3. The evaluation committee for initial accreditation visits the institution and submits its report to the Committee on Standards and Reports. This Committee makes its recommendation on the granting of accreditation to the Executive Council which will refer its recommendation to the Commission on Colleges for final action.

An institution receiving initial accreditation must have its accreditation status reaffirmed at the end of five years. This involves the following:

1. The institution is required to complete a comprehensive self-study.

2. An evaluation committee for reaffirmation of accreditation visits the institution at the completion of the self-study. Its report is submitted to the Committee on Standards and Reports which then makes a recommendation as to reaffirmation of accredication to the

Executive Council, which refers its recommendation to the Commission on Colleges for final action.

After this first five-year reaffirmation institutions are required to repeat the reaffirmation process every ten years.

At every stage of this process institutions are advised by the staff of the Commission on Colleges, and staff members accompany each evaluation committee to aid in the coordination of the visit and to help ensure that the the procedures of the Commission on Colleges are followed. Staff members do not serve as evaluators. On each occasion when a committee visits an institution, an exit conference is held with the chief executive officer of the institution. Institutions are invited in each instance to respond in writing to reports of visiting committees, and the chief executive officer is sometimes asked to appear before the appropriate Committee on Standards and Reports.

There are other occasions when committees are sent to institutions. This happens when, for example, a four-year institution requests that it be allowed to offer graduate work, or when it expands its off-campus programs. Special evaluation committees may be authorized by one of the Committees on Standards and Reports if significant problems develop in an institution in relation to the standards of the Commission on Colleges. The costs of all committee visits are borne by the institution which is being evaluated.

The two Committees on Standards and Reports, therefore, have the important task of reviewing all reports, and institutional responses to reports, of visiting evaluation committees, whether part of the normal cycle of accreditation and reaffirmation or resulting from special visits. These also involve the requesting of, and review of, special follow-up reports by institutions, and review of the fifth-year report required of each institution at the mid-point of the reaffirmation cycle. Recommendations made by the Standards

and Reports Committees may also include that of placing an institution on probation because of non-compliance with the standards, or dropping it from membership. Recommendations for negative actions are made to the Executive Council, and its recommendation is sent to the Commission for final action. An institution may be placed on "notice" by the Committees on Standards and Reports. This is a private status which is a warning that if deficiences are not remedied the institution may be placed on probation, a status which is published.

Institutions may appeal negative decisions by the Commission on Colleges. An appeals committee of nine members with provision for rotation is elected by the College Delegate Assembly from its membership. No person on this appeals committee may be serving on the Commission on Colleges or its committees. The appeals committee has the power to affirm or reverse a negative action of the Commission, or to remand the case to the Commission for final action.

The validity and equity of the review process at the levels of the Standards and Reports Committees and the Commission depends in large part on that level of review which is carried out by the visiting evaluation committees. These committees of peer evaluators are drawn primarily from member institutions in the South, but evaluators from outside the region are also used. The philosophy of the Commission on Colleges has been to involve as many faculty members and administrators from as many institutions as possible in the evaluation process. We have developed a list of approximately 4,700 evaluators who are available for service on committees. They currently represent 688 institutions in our region. Computer access enables us to print out a card for each of these 4,700 evaluators, with such pertinent information as academic and administrative background, in addition to a record of each time the evaluator has served and his rating by the chairman of the visiting committee and by

the staff member who accompanied the committee. Many of these evaluators are trained in workshops conducted by the Commission. Experienced committee members who have demonstrated skill and leadership ability are formally trained as chairmen.

These peer volunteers are the real strength of regional accreditation. They are paid a small honorarium by the Commission on Colleges--$50 for members of a committee and $100 for the chairman--for what is normally a three-day intensive working visit to a college campus. A few statistics illustrate the scope of this volunteer effort. During 1982, 880 individuals participated on visiting committees to applying and member institutions as part of the peer review process. These individuals were drawn from 378 institutions.

As part of the process of reaffirmation of accreditation, institutions produce an analytical self-study and are then visited by a committee. The committee is expected to evaluate the institution against the standards of the Commission on Colleges and, in light of the institution's stated educational mission, evaluate the adequacy of the self-study. They are also asked to offer advice and suggestions helpful in the future development of the institution. Committee members serve as both evaluators and consultants. The recommendations of the visiting committees are considered seriously by the Standards and Reports Committees. The staff of the Commission on Colleges is very careful when putting together any visiting committee. No evaluators are drawn from the state in which the institution to be visited is located. Visiting committee members have had no relationship with the institution which might prejudice their judgment.

We are proud that the Commission on Colleges has been able to involve so many educators at all levels of our accreditation process. The flow of educators from institution to institution is exciting not only because it

is an effective method of self-regulation, but also because it results in a cross-fertilization of ideas which in itself leads to institutional improvement throughout the South.

We have been asked to provide our reaction to the findings contained in the Carnegie Foundation report on the governance of higher education. The major conclusion of the report is clear: the academic community must assume primary responsibility for its own regulation if quality and independence are to be characteristics of our postsecondary institutions. The report points out the detrimental effects of what it terms an "ever-increasing role of outside agencies in campus matters."

We agree that the academic community must be responsible for its own regulation, and it is this aspect of the report that intimately involves our work in regional accreditation. Certainly the presidents of our member institutions would conclude that there has been a diminution of institutional independence as a result of the actions of state government the federal government, and the courts. As the Carnegie Report rightly points our, instances of interference have not been, for the most part, dramatic or particularly odious, and have been accomplished with the best of motives. But the cumulative impact of government intervention has been significant. In 1976 the Commission on Colleges, because of a growing concern over federal regulation, surveyed its membership to gather information detailing the cost and problems involved with institutional compliance with federal regulations and requirements. The report resulting from the survey concluded that the quality of educational offerings to students was being affected adversely by the necessity for federal compliance in a large number of programs. Adding to the concern of our member institutions lately has been the initiation in several southern states of accreditation and approval

activities conducted by state agencies, resulting in duplication of effort and a further burden being placed on the institutions.

The Commission on Colleges has defended the autonomy of member institutions many times in the past: during the years when Governor Huey Long directly injected himself into the affairs of Louisiana institutions, in Kentucky and Georgia during the 1940's in similar situations; during the early 1960's, the time of integration, when the Governor of Mississippi took over as registrar of the University of Mississippi; and in 1963 when the state of North Carolina prevented those with certain political affiliations from speaking on college campuses. These were dramatic instances, and action by the Commission was an important factor in resolving the difficulties. The challenge in our present situation, however, is to defend our institutions against an accumulation of less dramatic intrusions. The burden of this defense rests partly, and rightly so, on the shoulders of the thousands of evaluators on our committees whose responsibility is ensuring that our institutions continue to operate without stultifying outside interference.

The Carnegie report offers a number of recommendations in the chapter entitled "A Governance Framework for Higher Education." Those recommendations pertaining to the role of college governing boards we support fully. Governing boards have an important duty in protecting institutional autonomy. Our own standards of the Commission on Colleges call for the governing board to protect the college administration from undue pressure from political or religious bodies. We would add to these recommendations an encouragement to governing boards to become more knowledgeable about the meaning and processes of accreditation. This would help us considerably.

The recommendations in the report directed to state governments are useful, and if adopted would help maintain the institutional autonomy we all

desire. One recommendation calls for state coordinating agencies to work closely with regional accrediting associations to evaluate the performance of each campus. We have tried to encourage this by notifying these agencies of accrediting visits and by allowing an institution to invite members of the agency to be present during the visit to provide useful information to the committee.

The Carnegie Report recommends that the preparation of an approved list of regional associations be a function of the Council on Postsecondary Accreditation, not the federal government. We concur, and would hope that much of the recognition function of COPA could be utilized by the Secretary of Education. From 1952 to 1968 the Office of Education, in publishing its list of recognized accrediting agencies, relied on the decisions of private accrediting agencies whose determinations were widely recognized in the academic community as being sufficiently reliable for this purpose. It was not until 1968 that the then Office of Education established a special staff on accreditation and institutional eligibility, which began to develop an extensive list of criteria accrediting agencies had to employ to be recognized. These criteria, unfortunately, have been expanded through the years and we have often registered our objection.

COPA is not without its imperfections: neither are its constituent members. It does, however, utilize a highly developed recognition process, the validity of which is enhanced by the participation of not only those in accrediting, but by persons representing national postsecondary educational organizations, and the public.

The Carnegie report views regional accrediation as a critically important part of academic governance and recommends that officials at all colleges should fully support the regional associations. We welcome and support

this recommendation. It implies, however, that regional accrediting associations currently lack support from the academic community. This implication is reinforced by statements in the report that "accreditation has increasingly lost significance," that "accreditation review often is little more than an empty ritual," and that "higher education leaders frequently decline to participate in the process." We do not believe these statements to be accurate. Administrators and faculty members from our institutions value the process and consider serving on visiting committees and on the Commission on Colleges a significant means of professional development, as well as a responsibility. During 1982, 130 committees, with a total of 880 evaluators, visited candidate, member, or applying institutions. These evaluators were drawn from 378 institutions. Included were evaluators from:

University of Alabama
University of Florida
Florida State University
Emory University
University of Georgia
University of Kentucky
Louisiana State University
Tulane University
Davidson College
Duke University
University of North Carolina at Chapel Hill
University of South Carolina
University of Tennessee at Knoxville
Vanderbilt University
Baylor University
University of Texas at Austin
College of William and Mary
University of Virginia

On the Commission on Colleges 60 institutions were represented, and 35 were represented on special committees.

The self-study process is also valued highly by member institutions. A 1973 survey of chief executive officers of member institutions indicated that, of those responding, 95.4% favored its continued use and an overwhelming

majority believed it to be both useful and necessary. In a 1981 survey of chief executive officers, of the approximately 95% who responded, 94% agreed that the self-study process was valuable and should be continued as a basis of reaffirmation of accreditation. We have responded to requests from university systems in three states that we assist them in the development of a system self-study, and that we evaluate the system and its self-study, not for accreditation purposes, but for the benefit of the system. This has also been the case in one large community college system.

The Carnegie Report also states that "among accreditors there is no agreement about the meaning of a college education, the neglect of undergraduate education is especially disturbing." Everyone recognizes that there are disagreements as to the meaning of a college education and the definition of quality. These disagreements will continue. The standards of the Commission on Colleges of the Southern Association of Colleges represent an attempt to define the essential elements which the academic community believes must be present for a college to conduct a quality educational program. Our standards, as is true with any standards, do not please everyone, but they do define in many ways what a college education should be, and they are certainly not neglectful of undergraduate education: 486 of our 723 institutions offer degrees only at the undergraduate level. The eleven current standards of the Commission on Colleges speak to an institution's purpose, organization and administration, educational program, financial resources, faculty, library, student development services, physical resources, special activities, graduate programs, and research.

The Commission on Colleges is currently in the process of revising all of its standards and procedures to give increased emphasis to the assessment of student outcomes and institutional planning. This project began with a survey in 1981 of over 2600 individuals, including chief executive

officers of institutions, chief academic officers, visiting committee members, officials of educational foundations, those in state and federal agencies, and others with an interest in accreditation. The survey was conducted to determine the effectiveness of the current accrediting process and ways the process could be improved. Committees were appointed which involved over 100 persons representing 75 member institutions. These committees gathered information, carefully reviewed the present standards and procedures, and drafted proposed criteria for accreditation. The proposed criteria were sent out for comment to selected individuals and reviewed by the Commission on Colleges. The entire membership received for review copies of the proposed criteria in December, 1982. In June, 1983 the Executive Council of the Commission will consider input from the membership and make any needed revisions. The proposed criteria for accreditation will be voted on by the entire membership at the annual meeting in December, 1983. This revision process is an arduous but necessary task. It is how the academic community goes about defining quality and establishing procedures for evaluation.

The Carnegie Report leaves the impression that regional accrediting associations evaluate colleges only on the basis of the objectives of the college, without requiring them to meet standards of quality. For an institution to be accredited by the Commission on Colleges it must be in compliance with the standards. Educational programs offered should be in accord with the stated mission and advertising of the institution. A college of art, as well as a small liberal arts college, or a large complex state university, is required to show that its curriculum and resources are appropriate to its mission, are sufficiently developed to satisfy the standards, and are in congruence with what is currently-accepted good practice according to the academic community.

The Carnegie Report states that regional accrediting associations should expand the scope of their authority and hold colleges accountable for good management, consumer protection, and affirmative action. We believe that we are currently holding colleges responsible for good management, not only of human resources, but physical and financial resources as well. Management, as it effects quality, is a primary concern in the evaluation process. We also believe that the most desirable consumer protection we can provide is to help ensure that students receive a quality education and that institutions accurately describe to students the nature of the college and what is to be expected of both parties to the educational process. It is not desirable, and probably would be impossible, for regional accrediting associations to become involved in the intricacies of enforcing the multitude of government regulations and guidelines. The complexities and difficulties faced in enforcing affirmative action in postsecondary education are also apparent. Enforcement of government regulations and affirmative action should be the purview of government, or if necessary, the courts. There are very few in postsecondary education who would desire to see regional accrediting associations become a policing arm of government.

A further recommendation of the report is that information about the accreditation of colleges should be more accessible to the public. At present our Commission on Colleges publishes the fact that an institution has been placed on probation or dropped from membership, and cites the standards with which the institution has failed to comply. We agree that more information should be provided. The regional commissions have agreed on this point and are working to accomplish it without violating confidential information.

A final recommandation on which we would like to comment is the proposal

that a court of last resort be organized by COPA to hear an appeal from an institution which believes it has been unfairly treated by a regional association. We believe this to unnecessary because each regional commission has an adequate appeals procedure, a requirement for COPA recognition. COPA also solicits third-party testimony as part of the recognition process.

In conclusion I would like to say that regional accreditation is a highly coveted status for postsecondary institutions. Not only is it desirable for reasons of prestige, but because: it is an important consideration when a student selects a college to attend; it facilitates the transfer of credits and the admission of students to institutions at higher degree levels; it gives guidance to employers, who not only hire graduates, but in many instances pay the tuition of their employees; it is relied on by the Veterans Administration and the military services in their funding of tuition; it is linked to institutional eligibility for federal funding; and it influences the funding decisions of foundations.

It has been a pleasure to testify before you today. I am always enthusiastic when I have an opportunity to comment on regional accrediting and what it has meant and continues to mean to postsecondary education.

Mr. HARRISON. Thank you very much, Dr. Sweet. I think our tradition here is to go through the panel and then come back. Perhaps we will have some questions at a later time.

Dr. Manning.

STATEMENT OF THURSTON E. MANNING, DIRECTOR, COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION

Mr. MANNING. Mr. Chairman, members of the subcommittee, I am Thurston E. Manning, the director of the Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools. That is quite a mouthful and I do not blame the staff for leaving all of it off the agenda.

North Central Association, like the Southern Association, is one of the six regional voluntary accrediting associations in the United States. Our geographic territory in North Central is 19 States in the central part of our country, running from West Virginia on the east to Arizona on the west, the Canadian border to the north, through Oklahoma and Arkansas on the south, the Midwest and the associated parts of the United States.

In that region, the North Central Association accredits some 5,000 elementary, junior, middle, and secondary schools through its commissions on schools, and some 915 colleges and universities through the Commission on Institutions of Higher Education. We also have 46 institutions, postsecondary institutions, that are in candidacy at this point.

As the chairman requested, I have divided my testimony into three parts, first, describing North Central's criteria and procedures; second, the meaning of accreditation and what loss of accreditation might entail to an institution; and third, some comments on the Carnegie Foundation report.

I have, of course, prepared a written statement which you have for the record and all I will try to do here is summarize some points about that statement.

Mr. HARRISON. Without objection, your written statement will be incorporated into the record.

Mr. MANNING. North Central Association first began accrediting colleges and universities in 1913, 70 years next month to be more exact about it. Obviously, things have changed in 70 years. The procedures and criteria that are used in 1983 are quite different from those that were used in 1913.

However, for about 50 years, North Central, like the other regional accrediting organizations, has based its accreditation on a fundamental principle that an institution should be judged in the light of its own appropriate and stated purposes. The basic reason for this principle is that it allows for diversity in higher education in the United States and the adoption of it really rests on the belief that only by providing a diversity of postsecondary institutions can the diversity that is necessary and characteristic of American society be maintained.

We cannot serve society well by forcing all colleges and universities into the same mold, regardless of how well-conceived that mold may be. Sometimes that basic principle is misunderstood and dis-

torted. I think this appears at one point in the Carnegie Foundation report.

It is assumed that if you want to judge an institution on the basis of its own stated purposes, that anything goes. One could have a school for thieves, for example, which would meet its own stated purposes and therefore be accreditable. Of course, that is not true.

We emphasize the basic principle so much that we may overlook emphasizing that we do far more than simply judge on the basis of stated purposes. For one thing, we judge the purposes. Are they appropriate to a postsecondary educational institution? That is one of the basic criteria utilized by North Central and the other regionals, the question of appropriateness of the criteria.

Second, there are explicit general institutional requirements, as we call them in North Central, which specify elements of organization, management, basic principles that experience has shown are necessary for any successful postsecondary institution or one that falls within our scope of activity.

For example, we require a regular external audit of financial statements. We require the fair and accurate disclosure of information for students and the public. We require the presence of public representation on the governing board of the institution.

All of those matters are explicit requirements which clearly go beyond merely judging an institution in the light of its own activities.

Our procedures are very similar to those utilized by the Southern Association, the other regional associations which Dr. Sweet has described. Reliance on self-study by the institution, a visiting team drawn from persons from other accredited institutions, a review process, final decision by an executive board, and then an appeal process outside of the commission established through the board of directors of the association.

Accreditation, of course, is a public stamp of approval. It indicates that the institution has been examined by a qualified, independent group of peers and found to be meeting appropriate purposes in a satisfactory manner. It provides assurance to those within the institution that their work is regarded as desirable and satisfactory and assurance to those outside the institution that the institution performs useful activity for the benefit of society.

Public approval has been accepted as a basis for action by many groups and consequently loss of accreditation can have serious consequences because it is loss of this basic indicator of quality. As Mr. Sweet has indicated, an accredited institution can recruit students more easily because the students can have confidence that the institution has been examined and found to be of a reasonable quality.

Students can also expect from an accredited institution a better chance that their credits will transfer or that they will be accepted into another institution for an advanced degree. Accreditation is often used by private industry as a basis for reimbursement for tuition by States for State financial aid or grants to institutions, and, of course, as a basic threshold eligibility requirement for Federal programs, both institutional grants and grants for student financial aid.

Consequently, loss of this basic indicator of public quality has an effect. All of these things tend to fall if that indicator is lost. The indication of accreditation, then, as a public indicator is what it means and loss of that indication has serious consequences.

Let me turn now to the Carnegie Foundation report and not try to deal with all of the recommendations, but just with a few that pertain to accreditation. In general, I think the report is a valuable document. Its principal thrust, as I read it, is to describe the way in which a growing body of State and Federal regulations and statutes now so restrict colleges and universities that they have lost much of their ability to change and respond to new needs of society.

The report recommends addressing this problem by returning to a greater reliance on self-regulation by institutions acting for themselves and through voluntary associations, such as the accrediting bodies. I agree with this general conclusion and with this recommendation, but I do not underestimate the problem of disentangling all the many threads of statutes and regulations that have now formed these heavy ropes that bind colleges and universities. That is another question.

I think the report in many cases understates the current activity and the strength of the accrediting associations. For example, of the 650 persons who form the pool from which we draw our visiting teams, our review committees, our executive board, I counted over the last weekend some 200 persons who are chief executive officers of their institutions, another 200 who are the principal academic officers, vice presidents, and deans, out of that group.

Of the 12 persons on our executive board who are drawn from postsecondary institutions, 7 of them are presidents, and the board is chaired by the president of the University of Nebraska. So I think the statement in the report that leaders of higher education do not participate in accreditation, in fact, is not the case and is not supported by reasonable data.

Similarly, I think that the report understates the activity of accreditation or overstates its position, however you want to put it, when it says that we do not pay attention to such things as affirmative action, provision of fair and accurate information and matters of that sort.

The accrediting agencies are not enforcing agencies for Federal or State statutes and regulations. We do, in fact, pay attention to these matters and we have policy statements that deal with these matters explicitly. I have already mentioned that we have some specific requirements pertaining to these.

An examination of our team reports shows that the teams take these things seriously and do draw them to the attention of the institutions. The "Federal connection," as the Carnegie report calls it, between accreditation and eligibility has been from time to time a controversial issue.

I agree with the report's recommendation that continued reliance on accreditation as a threshold criterion for eligiblity is desirable. It was put in place in the 1950's as a result of the abuses that arose during the administration of the GI bill of World War II. The fact that these abuses have not been repeated, except in isolated instances, is an indication, with 30 years of experience, that this

was a wise piece of Federal legislation and one that should be continued.

As part of this reliance, the Secretary of Education maintains a list of accrediting bodies, as you know. The report suggests that the Secretary should use instead the list of accrediting bodies recognized by the Council on Postsecondary Accreditation. I do not fully agree with this recommendation.

While accrediting bodies would welcome the disappearance of the present duplication of two recognition processes, we come to the Secretary and we also go to COPA, though we go to COPA voluntarily, come to the Secretary voluntarily, too, I suppose, there are good reasons for both. I think the Federal Government, as Dr. Ambach indicated, must assure itself about the accreditation that it uses. It can do this either by examining the accrediting bodies directly, which is what it does now, or it can take COPA's word for it, provided it supervises the regulatory process of COPA.

Now this latter alternative, I think, opens up all kinds of new problems and I think solving those problems would not be worth the price that one would pay to work through all the details.

The present spirit of cooperation between the Council and the staff of the department that deal with this problem, let me put it this way, however, opens up a new possibility, namely the use of a single submission to both groups. Each group, the Secretary on the one hand, COPA on the other hand, could make its separate decision, but the accrediting bodies would be spared the difficulty and the task of putting together two separate but somewhat duplicative submissions.

No new legislation would be necessary for this. All that is really needed is a spirit of cooperation between the two organizations in establishing a common set of requirements against which to measure the accrediting bodies.

Mr. Chairman, let me thank you and the subcommittee for the opportunity to testify. I think the time is right for a reconsideration of the many regulations that currently restrain institutional governance. The Carnegie report points to many of these.

In the interest of the subcommittee in addressing the matters, it is heartening and encouraging to all of us.

[Prepared statement of Thurston Manning follows:]

PREPARED STATEMENT OF THURSTON E. MANNING, DIRECTOR, COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION, NORTH CENTRAL ASSOCIATION OF COLLEGES AND SCHOOLS, CHICAGO, ILL.

Mr. Chairman, Honorable members of the Subcommittee on Postsecondary Education:

I am Thurston E. Manning, Director of the Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools. I thank you for the opportunity to appear before the Subcommittee on behalf of the Association and the Commission. The North Central Association accredits elementary, junior/middle, and secondary schools through its Commission on Schools, and postsecondary institutions through its Commission on Institutions of Higher Education. The geographical territory of the Association is the nineteen states of Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin and Wyoming; this area is the center of our country, from West Virginia on the East through Arizona on the West, and from the Canadian border on the North through Oklahoma and Arkansas on the South. North Central accredits in this region some 915 colleges and universities, with an additional 46 institutions affiliated as candidates.

In response to the request of the Chairman, this testimony is divided into three sections: the first dealing with the criteria and procedures used by North Central to accredit a postsecondary institution; the second with the questions what accreditation means to an institution and what withdrawal of accreditation could lead to; the third with my reactions to the findings and recommendations contained in the Carnegie Foundation report, The Control of the Campus.

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1. Criteria and Procedures Used to Accredit a Postsecondary Institution.

The first list of colleges and universities accredited by the North Central Association was published in 1913. The criteria used some seventy years ago strongly affected the development of higher education, and over the years the criteria were changed and adapted to the changes that had occurred. As a result of an extended study conducted by the Association in the early thirties the Association adopted as a fundamental principle that an institution should be judged in the light of its own stated purposes. This principle still underlies the accreditation of postsecondary institutions, not only by North Central but also by all other postsecondary institutional accrediting bodies. It is an expression of the generally accepted view that the diversity of American society is served best by a diversity of educational institutions. This diversity cannot exist if all institutions are forced into the same mold by any single set of external standards, however well intentioned such standards might be. There is a substantial store of experience and data supporting this point of view.

But the principle of judging an institution in the light of its own purposes does not mean that "anything goes:" that an institution is accreditable if its meets its purposes, whatever those purposes may be. An essential part of the accreditation judgment -- sometimes not sufficiently emphasized -- is a judgment of the institutional purposes themselves: are they appropriate to a postsecondary educational institution. A further essential of the accreditation judgment is whether the institution meets certain minimum requirements of organization and of good practices in its operations -- requirements that experience has shown are appropriate to all institutions that provide satisfactory postsecondary education.

The Commission most recently reviewed and revised its criteria in 1980. The criteria currently consist of two sections: a set of General Institutional Requirements, which both

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accredited and candidate institutions must meet, and a set of Evaluative Criteria, which differ for accredited and candidate institutions. The General Institutional Requirements specify the minimum requirements of organization and good practice; the Evaluative Criteria provide the basis for judging the institution against its stated and appropriate purposes.

The thirteen General Institutional Requirements are:

Requirements of institutional program:

The institution

1. Has formally adopted a statement of mission appropriate to a postsecondary educational institution;

2. Offers one or more programs (or curricula) consistent with that mission, including general education at the postsecondary level as an essential element of, or a prerequisite to, the principal program(s);

3. Has adopted a statement specifying the potential students it wishes to serve, and admits students to its programs under admissions policies compatible with this statement and appropriate to the programs;

4. Enrolls students in at least one postsecondary educational program normally requiring at least one academic year (or equivalent) for completion, and has students actively pursuing such an educational program at the time of the Commission's evaluation;

5. Awards to each person successfully completing an educational program a certificate, diploma or degree appropriately describing the demonstrated attainments of the graduate.

Requirements of organization:

The institution

6. Has a charter and/or other formal authority from an appropriate governmental agency authorizing it to award any certificate, diploma or degree it awards;

7. Has all necessary operating authorities in each jurisdiction in which it operates;

8. Has formally designated a chief executive officer, or has formally organized and staffed a chief executive office;

9. Has a governing board that includes representation reflecting the public interest.

Requirements of operation and public disclosure:

The institution

10. Documents a funding base, financial resources, and plans for financial development adequate to carry out its stated purposes;

11. Has its financial records externally audited on a regular schedule, and makes available to the public on request the most recent report of the external auditor (or a fair summary thereof), including the auditor's opinion;

12. Makes freely available to all interested persons (and especially its present and prospective students) accurate, fair, and substantially complete descriptions of its programs, activities and procedures;

13. Will have completed at least one complete cycle of its principal programs before the Commission's evaluation for accredited status.

The Evaluative Criteria for Accreditation are

1. The institution has clear and publicly stated purposes, consistent with its mission and appropriate to a postsecondary educational institution;

2. The institution has effectively organized adequate human, financial and physical resources into educational and other programs to accomplish its purposes;

3. The institution is accomplishing its purposes;

4. The institution can continue to accomplish its purposes.

The four Evaluative Criteria for Candidacy for Accreditation are:

1. The institution has clear and publicly stated purposes, consistent with its mission and appropriate to a postsecondary educational institution;

2. The institution has effectively organized adequate human, financial and physical resources into educational and other programs to accomplish its purposes;

3. The institution is following realistic plans to acquire and organize any additional resources needed to accomplish its stated purposes;

4. The institution has the potential to achieve accreditation within the candidacy period.

It will be observed that the Evaluative Criteria for Candidacy are closely related to those for accreditation, but are appropriate for an institution not yet fully enough developed or experienced to achieve accreditation.

The criteria are applied to an institution through a process that involves several steps:

1. The institution subjects itself to its own self-evaluation, seeking to gather information bearing on the criteria, and to make changes and improvements in its activities as it evaluates itself against the criteria. The institution documents this study in an extended document which serves as a basis for the following steps.

2. The Commission appoints a visiting team composed of persons from accredited institutions. This team visits the institution, conducting interviews and examining written records to supplement the information contained in the institution's self-study document. The visiting team prepares a written report on its findings and prepares a recommendation for the Commission's action. The visiting team also provides counsel to the institution. The institution is invited to respond to the team's findings and recommendation.

3. The institution's self-study document, the team report and the institution's response are reviewed through the Commission's review process, using other persons from accredited institutions. The review process may result in additional recommendations for consideration in the Commission's action. The institution is invited to respond to any additional recommendations.

4. The Executive Board of the Commission, comprising twelve persons elected from accredited institutions and two public members, considers the full set of written materials and recommendations and adopts a final accreditation action in the name of the Commission.

5. The institution may appeal from the Commission action to a separate appeal body established outside the Commission by the Association Board of Directors. If an appeal is denied the Commission action stands; if the appeal is sustained the case is returned to the Commission for correction of the errors found and reconsideration of the action.

Through this rather elaborate process the Commission provides for the exercise of professional judgment on the question of whether an institution meets the criteria. The institution is provided ample opportunity to present its case, and the Commission provides for consideration by several different groups of persons drawn from accredited institutions, thus helping to insure that the final action represents the general opinion of qualified persons, and is not unduly influenced by the views of individuals or of particular groups. The process is one of peer review: persons from accredited institutions judging another institution. There is substantial evidence that these criteria and the process of applying them meet with the general approval of the higher education community.

2. What Accreditation Means to an Institution
and What Withdrawal of Accreditation Could Lead to.

The accreditation of an institution is a public stamp of approval indicating that the institution has been examined by a qualified, independent group of peers and found to be meeting its appropriate purposes in a satisfactory manner. Like any meaningful expression of approval accreditation is valued by an institution. It provides assurance to those within the institution that their work is regarded as desirable and satisfactory. It provides assurance to those outside the institution that the institution performs useful activity for society.

This public approval has been accepted as a basis for action by many groups. Students use accreditation as an indicator that an institution offers a satisfactory level of educational activities. Those who provide financial support to students -- parents, employers, states and the federal government -- use accreditation as an indicator that the education offered by an accredited institution is of satisfactory quality and therefore a good investment. Other institutions are far more likely to accept for transfer or admission to higher degrees credits earned at an accredited institution. In short, accreditation serves as a basic indicator of quality within an institution and is used by those concerned with institutional quality.

Loss of accreditation will have significant effects on an institution because it is the loss of this basic indicator of quality. The institution will have difficulty recruiting students, who will no longer have the assurance of a program of acceptable quality. Parents will be less willing to provide financial support for students to attend an unaccredited institution. Many employers provide tuition reimbursement and other forms of financial assistance to employees attending only accredited institutions. Many states

provide financial assistance to students only at accredited institutions. Most programs of federal financial assistance (both student aid and institutional grants) are restricted generally to accredited institutions (although the federal government has provided certain alternatives to accreditation). In short, loss of accreditation leads to a diminished public credibility for an institution, and diminished credibility has important consequences.

It must be kept in mind that accreditation is a pass-fail judgment: an accredited institution is certified merely as being of at least acceptable quality. As is true for all such pass-fail judgments, most of those that pass of are substantially higher quality than is required for mere passing. For these institutions the process of accreditation has assumed a greater importance than the certification of accreditation. Through the process an institution is stimulated to thorough and extensive self-evaluation and provided with external counsel from qualified persons from other accredited institutions. This process demonstrably encourages desirable changes and improvements in an institution, however high its quality may be. Thus, even for institutions that are clearly accreditable, the process of accreditation is a desirable one. It is for this reason that accreditation is regarded by institutions as a useful activity, and accreditation is supported by virtually all postsecondary institutions.

3. Comments on the Carnegie Report

The Control of the Campus, subtitled "A Carnegie Foundation Essay," was published by the Carnegie Foundation for the Advancement of Teaching in late 1982. It is a valuable study, providing in its first part a useful historical summary of the development of the present conditions of institutional integrity and public accountability, and in its later sections numerous recommendations for modifications in present conditions.

The historical summary shows clearly how present constraints on institutions of higher education have grown bit by bit over many years. Taken one by one, the constraints imposed by the states and the federal government through statutes and regulations appear reasonable. But, as the Carnegie Report makes clear, the present situation is one in which colleges and universities find themselves so restricted by the demands of multiple statutes and regulations that they have lost much of their ability to change and respond to new needs of society. Each individual requirement is a slender thread, reasonable in itself. But taken together these threads have formed heavy ropes constraining reasonable and necessary freedom. The report properly call for reasonable relief from these constraints so that institutions can serve society appropriately. A principal means of relief described in the Report is a return to greater self-regulation by institutions acting by themselves and through voluntary associations, such as the accrediting bodies. I agree with this general conclusion and recommendation.

Each of the many recommendations in the Report deserves attention. For reasons of time I can mention only some of those directed specifically at accreditation.

Certainly no objection can be raised to the general thrust of these recommendations. But I think that the Report does not correctly describe the present circumstances in its discussion on pages 76-78. Our experience in North Central does not support the Report's comment that "higher education leaders frequently decline to participate" in the accreditation process. Our roster of some 650 persons who serve on our visiting teams, in our review processes, and on our Executive Board includes over 190 college and university presidents, and another almost 200 chief academic officers -- deans and vice presidents. Our Executive Board is currently chaired by the President of the University of Nebraska, and counts seven presidents among its twelve institutional members. All these persons devote each year many days of hard work to accreditation.

As I have discussed earlier, and contrary to the statement of the Report (page 77) accreditation does more than "measure a college against its own objectives."

While accrediting bodies are not enforcement agencies for federal or state requirements for management, affirmative action and consumer protection, we do pay attention to these matters, contrary to the implication of the Report (page 77). Our General Institutional Requirements speak explicitly to the presence of public representation on governing boards and to the public disclosure of financial and other information of importance to educational consumers, among other things. North Central has a general policy as follows:

> "The Commission expects an affiliated institution to evaluate its policies and practices relating to such things as protection and nondiscrimination, monitoring of student financial aid, mediation of internal strife and institutional sponsorship of nonacademic activities. Therefore, a visiting team may include assessment of such practices and policies in its evaluation of an institution, and may comment on such matters in its written report."

Examination of our team reports shows that our evaluators takes such matters seriously — sometimes to the discomfort of an institution being evaluated.

Of course no accrediting body is perfect. Accreditation and institutional evaluation are difficult and demanding tasks, and like other human enterprises we fall short of our ideals. The comments in the Report are valuable in providing an additional spur to our improvement, as well as a support for the goals we have set.

I fully agree with the Report's recommendation (page 77) that "information about the accreditation of colleges should be more accessible to the public." The balance between confidentiality, needed for full access to information, and public disclosure, needed for continued credibility and usefulness of accreditation, has been struck too far toward confidentiality, in my view. These are issues under active consideration. The Council on Postsecondary Accreditation has a special committee studying the matter of public disclosure, and we trust that it will produce recommendations that can be embraced by all accrediting bodies. Within North Central we have examined the kinds of information that should properly be public, and will be considering a new policy statement in April.

The "federal connection" between accreditation and eligibility for federal funding has been the subject of much discussion and some controversy. I agree with the position of the Carnegie report (page 82) that we should maintain the reliance of the federal government "on the academy itself -- through voluntary accreditation -- to determine which colleges are eligible to get federal support." The experience of abuses arising from the G.I. Bill of World War II -- which gave rise to this reliance -- shows that a test of basic institutional quality is necessary. Certainly there are problems in the present arrangements, but, as the Carnegie Report notes (page 82), "This procedure is not perfect but it is better than having the Department of Education evaluating colleges. . ." The explicit recommendation (page 83), "In determining the eligibility of colleges to participate in federal programs, the Secretary of Education should use regional accreditation as the basis for approval," needs to be widened to include the institutional accreditating bodies other than the regionals that now appear on the Secretary's list, since these bodies provide accreditation to many worthy institutions lying outside the scope of the regionals.

An essential part of this process is the listing of accrediting bodies whose accreditation is accepted for purposes of federal eligibility. The Report recommends (page 83), "The preparation of an approved list of regional associations should be a function of the Council of Postsecondary Accreditation, not the federal government." I do not fully agree with this recommendation. Certainly it would be helpful if the present duplication existing in the independent recognition processes of the Department of Education and of the Council could be eliminated. But it seems to me that the federal government must assure itself about the accreditation which it uses for decisions about financial aid. This cannot be done unless federal officers either examine the accrediting bodies directly (as is now done), or else supervise the recognition process of the Council. I think this latter alternative presents new problems, and dealing with them will cost more than the value of the advantage gained. The present spirit of cooperation between the Council and the Eligibility and Agency Evaluation Staff of the Department opens a more attractive opportunity: the use of the same submission by the accrediting bodies to the Council and the Department, allowing each to make its separate decision, but eliminating the duplication of submissions now required of the accrediting bodies. This procedure would require not new legislation, but simply cooperation between the Council and the Department in settling on a common list of requirements against which to measure the accrediting bodies.

Let me again express my thanks to the Subcommittee for the opportunity to testify. The time is ripe for a reconsideration of the many regulations that currently constrain institutional governance. The Carnegie Report points to many places at which improvement can be made. The interest of the Subcommittee in addressing these matters is heartening to all in higher education.

Mr. SIMON. Thank you, Dr. Manning. My apologies to the first two witnesses for my absence.

Dr. Phillips.

STATEMENT OF JAMES M. PHILLIPS, EXECUTIVE DIRECTOR, ACCREDITING COMMISSION, ASSOCIATION OF INDEPENDENT COLLEGES AND SCHOOLS, ACCOMPANIED BY ROBERT KLINE, CHAIRMAN; AND WILLIAM C. CLOHAN, JR., GENERAL COUNSEL

Mr. PHILLIPS. Thank you, Mr. Chairman, members of the committee. I am James Phillips, executive director of the Accrediting Commission for the Association of Independent Colleges and Schools. As indicated earlier, I am accompanied today by Dr. Robert Kline from South Carolina, who is chairman of the Accrediting Commission and Mr. William Clohan, who is our general legal counsel and former Under Secretary of Education.

I would like to give just a brief historical overview as Dr. Kline can talk to you about the procedures and then comment briefly on the Carnegie recommendations. Also, if I may, I will clarify a couple of statements that got into the testimony here on Tuesday that we feel were either misunderstood or inaccurate.

We do consider the schools that we represent to be a significant sector of the postsecondary education community of this country. The recent Carnegie study failed to recognize or dwell at any length at all on our sector of postsecondary education. It lumped us for listing purposes between two very specialized programmatic agencies. We have mixed feelings about that. We do not mind being ignored for the right reasons. We are concerned that perhaps the occupation sector of postsecondary education in this country is continuing to be ignored by the so-called traditional sector of higher education.

I would like to address that just very briefly by saying that the report mentions 3,100 accredited institutions, and I think it just refers to them as institutions, not colleges and universities. I call the attention of this committee to the fact that there are twice that many accredited occupational institutions in the country.

That is the sector, by and large, with which our association deals. Ninety percent of our accredited institutions are taxpaying business corporations. We have been listed by the Department of Education as a recognized accrediting body since 1956. Today we have 571 schools and colleges and another 174 branch campuses that have been thoroughly evaluated and accredited by our organization. All of these are private institutions.

They range in types from specialized business programs of less than 1 year in length all the way to institutions offering graduate education. We estimate that there are 400,000 students today enrolled in our sector of institutions. Nearly all of the graduates available for employment finishing their training at our institutions do, in fact, become employed in occupations, professions, and services, including self-employment, for which they have been trained.

I will ask Dr. Kline to discuss just briefly with you the process that we utilize which almost is similar to those already described by the regional accrediting representatives.

Mr. KLINE. Thank you, my name is Dr. Kline and I am chairman of the AICS Accrediting Commission and a professor of business administration at Winthrop College.

I am going to talk about three things: the accrediting process, a little bit about the educational community's involvement in that process, and also briefly about denials, withdrawals, and litigation.

The AICS Accrediting Commission is broadly representative of each of the types of institutions that we accredit. The accrediting commission also includes three external members who are not from accrediting institutions, and usually from collegiate schools of business. I happen to be one of those members who is from a nonaccredited school.

In addition, there are public members who are appointed, and we have another one to be appointed this year. In addition to this, there is an outside advisory committee to the commission consisting of traditional and vocational educators, representatives of the general public, and representatives of students.

The policies and procedures in criteria over which our institutions are evaluated are more similar than dissimilar to those employed by regional accreditation. We encourage institutions to continue self-monitoring and improvements of the accrediting process in areas such as student relations, academic programs, faculty qualifications, inservice training, administrative capabilities, and supervision of student financial aid programs.

We believe that it is important for members of this committee, as well as all Members of Congress, to understand and, hopefully, accept the fact that accrediting bodies simply cannot monitor an institution's day-to-day compliance with the myriad of Federal regulations associated with the administration of Federal financial aid.

Accreditation is, and should continue to be, relied on as a threshold requirement for student aid participation. There always is assessment by department beyond accreditation before eligibility is established.

We use a variety of outside people to be involved in the accrediting process, representatives of all groups. We have a waiting list of individuals throughout the country, both from AICS-accredited institutions, and from outside institutions that work on the accrediting teams and visit the institutions.

There is a frequent criticism in that nearly all institutions are accredited, and very few ever lose accreditation, therefore the process is meaningless. This is simply not true. AICS has refused to accredit many institutions because they fail to meet the criteria. We also routinely withdraw accreditation from institutions that no longer meet these guidelines and each and every withdrawal is published.

I will turn it back to Jim.

Mr. PHILLIPS. Briefly, on the Carnegie report and some of its recommendations, we, too, as do my colleagues, support some of the suggestions and recommendations for change and/or improvement in that report.

Most of the criticisms of accreditation in that report are really not new. Historically, we have heard them going back for years and years. Historically, and traditionally also, during economic

hard times, accreditation gets criticized along with other educational processes more than at other times. You can trace the history of this in the 1930's and the 1940's during the campus unrest period of the late 1960's and early 1970's, and now it has cropped again in the 1980's.

The old adage, again reported by the Carnegie Foundation, paraphrasing somewhat is let's throw accreditation off the campus and regain control of our own destiny, has been heard for years and years and years.

It is a typical complaint, usually from university administrators. You do not hear this complaint generally from students or from faculty. That seems to me to be the cadre to which the Carnegie report was suggesting that the control be returned. I am not sure that those criticisms are campuswide.

Specifically, we disagree with the recommendation on page 82 that in determining the eligibility of colleges, the Secretary should use regional accreditation as a basis for approval. As previously pointed out, regional accreditation accounts for only one-third of the currently accredited eligible institutions in the country. Were this recommendation to be implemented without some accompanying adjustment somewhere, you would immediately disinfranchise some 6,000 accredited institutions, and I do not know how many millions of students involved in these particular institutions.

The further recommendation that the Council on Postsecondary Accreditation, and not the Secretary, prepare the approved list of regional associations is probably impractical for some of the same reasons. The recommendation that regional associations should hold accountable for areas of special concern hold the campuses responsible for State and Federal agencies and concerns of the court, seems to us to contradict the concept of self-regulation that is promoted elsewhere in the Carnegie report.

Last, we would deem it an unnecessary delay in due process for COPA to be a court of last resort to resolve differences between member institutions and their accrediting organizations.

If I may, in conclusion, on Tuesday, if not directly, at least by inference, I am afraid the impression was left with some members of your committee, Mr. Chairman, specifically Mr. Owens asked the question of one witness whether there was any assessment or evaluation of institutions beyond the fact that they were accredited.

My interpretation, sitting in the audience, to the response to that was, well, no, that is it, once you are accredited, you are eligible. I suggest to you that there are other levels of evaluation, particularly with our sector of schools.

Accreditation is just the first ticket-punch, so to speak. There are at least two other ticket punch stops before those eligibility agreements are in place and the funds begin to flow. Those responsibilities lie within the Department of Education.

Coming back the other way, the Department has on the books the statutes, the legal authority to limit, suspend, or terminate those funds for cause at any time without consulting with accreditation or regardless of the accrediting status of an institution.

It is partially because of that, and those numbers of regulations, that we think it is probably impossible and improper for accredit-

ing agencies to have to try to monitor all of those during the accrediting process.

The other area that seemed to be misunderstood on Tuesday was that accreditation is the only route to eligibility for institutions. There are other routes.

With that, I will conclude.

[Prepared statement of James Phillips follows:]

PREPARED STATEMENT OF JAMES M. PHILLIPS, PH. D., EXECUTIVE DIRECTOR, ACCREDITING COMMISSION

SUMMARY OF TESTIMONY

1. The Association of Independent Colleges and Schools is one of several nationally recognized institutional accrediting bodies in the United States. It is not a "specialized" accrediting body in the sense of evaluating only explicit program offerings.

2. The national accrediting organizations were not mentioned in the recent Carnegie Foundation Report "Control of the Campus," even though they accredit as many or more institutions as do the regional accrediting bodies.

3. AICS has been recognized by the Commissioner/Secretary of Education since 1956, longer than some of the regional accrediting bodies.

4. AICS-accredited institutions range in type from those offering only short-term programs through those offering graduate degrees and they range in size from fewer than 200 students to as many as 6,000 students.

5. The AICS institutions offer education primarily in business-related areas and ninety percent of the institutions are tax-paying business corporations.

6. The policies, procedures, and criteria by which the AICS institutions are evaluated are more similar than dissimilar to those utilized by regional accrediting bodies.

7. Accreditation should continue to be relied on by the federal government as a threshold criterion to establish eligibility for participation in student financial assistance programs.

8. The AICS accrediting body is broadly representative of its types of institutions and includes or has input from the general public, business and industry, government, the professions, and vocational educators.

9. We oppose in the Carnegie Report the following recommendations:

   a. That only regional accreditation be used as a basis for establishing financial aid eligibility. This will not work.
   b. That accrediting bodies should or can hold campuses accountable for areas of special concern to state and federal agencies and the courts.
   c. That the Council on Postsecondary Accreditation (COPA) serve as a court of last resort in grievances between institutions and accrediting bodies.

10. We want to emphasize, contrary to some recent misstatement of fact, that accreditation is only a threshhold factor in establishing institutional eligibility. Eligibility assessment is made at two or more levels beyond accreditation and program participation agreements become contracts directly between the federal government and institutions. The limitation, suspension, or termination of those eligibility agreements is at the discretion of the federal government and in no way is tied to accreditation.

Mr. Chairman. Members of the Committee. Thank you for this opportunity to present testimony relative to the Carnegie Foundation Essay entitled "The Control of the Campus...." I am James Phillips, Executive Director of the Accrediting Commission of the Association of Independent Colleges and Schools (AICS). With me are Dr. Robert S. Kline, Professor at Winthrop College in South Carolina and Chairman of the Accrediting Commission, and Mr. William C. Clohan, Jr., partner in the Washington, D.C. law firm of Laessig, Brown, Hearn and Clohan and legal counsel to the Accrediting Commission. Prior to entering private practice, Mr. Clohan was Under Secretary of Education.

INTRODUCTION

We consider the schools and colleges that we represent to be a significant sector of the postsecondary education community. We want to emphasize that significance to you inasmuch as the recent study by the Carnegie Foundation for the Advancement of Teaching failed to recognize in context national institutional accrediting bodies such as AICS; rather lumping us for listing purposes between two very specialized programmatic-type accrediting bodies.

We have mixed feelings about being ignored in the essay. On the one hand, we were not included in the criticism contained in the report toward regional and specialized accrediting bodies. On the other hand, being ignored may reflect an historic and, apparently, continuing lack of acceptance of occupational education

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by the so-called traditional higher education community. I call your attention to the fact that there are nearly twice as many accredited occupational institutions as there are regionally accredited institutions in the United States. With few minor exceptions, all of these accredited occupational institutions are permitted to participate fully in all student financial assistance programs authorized by the Congress.

DESCRIPTION OF AICS

As an association of business schools, the professional ancestry of AICS may be traced back to the early 1900s. There were many business or commercial schools in existence long before that. Today, there are 40 member schools in the Association's Century Club, denoting that they have been in continuous operation for more than one hundred years.

The AICS Accrediting Commission has been listed by the Department of Education as a recognized accrediting body since 1956. Today, there are 571 schools and colleges and another 174 branch campuses accredited by AICS, each of which has been thoroughly evaluated by criteria comparable to, and in some areas more rigorous than, the criteria utilized by the regional accrediting associations.

Our types of institutions range from business or specialized schools offering training of up to one year in length to junior and senior colleges offering recognized associate and baccalaureate degrees. There are an estimated 400,000 students enrolled in these institutions.

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Our association and our institutions take pride in the fact that nearly all graduates available for employment do, in fact, become employed in occupations, professions, and services (including self-employment) for which they have been trained.

We note, also, for the benefit of this body and others presently concerned with precarious nationwide economic conditions that some ninety percent of the AICS-accredited institutions are tax-paying business corporations.

These institutions have always provided timely services adapted to the needs of the student and the community so that the educational programs are consistent with the needs of employers. Because employers' needs are changing constantly, the institutions adapt constantly to meet those needs.

THE AICS ACCREDITING PROCESS

Because the rapid changes in society are reflected daily in AICS institutions, we as their accrediting body have to be in tune with government, business, and industry in order to be sure the institutions are developing the competencies in students that the marketplace expects.

The AICS Accrediting Commission is broadly representative of each of our types of institutions, as well as having as members on it three or four external experts like Chairman Kline from non-AICS-accredited institutions. These usually are collegiate schools of business.

In addition, there is a public member with another to be appointed this year.

There is an outside Advisory Committee to the Commission, consisting of both traditional and vocational educators, government officials, professional business persons, and one person who during her tenure has moved from being a student to being an active partner in a small business.

The fact that our member institutions differ in some respects from traditional colleges and universities may account for our not being mentioned in the Carnegie Foundation Report.

However, I would like to emphasize that the policies, procedures, and criteria by which our institutions are evaluated are more similar than dissimilar to those employed by the regional accrediting bodies. AICS criteria are applied nationally, not regionally. We believe this is a strength--there is unquestioned consistency of quality standards from California to New York.

As a recognized institutional accrediting organization, we encourage our institutions to continue self-monitoring and improvement through the accrediting process in areas such as student relations, academic programs, faculty qualifications and in-service training, administrative capability, and supervision of student financial aid programs.

A word on the area just mentioned--supervision of financial aid. We believe it important for members of this Committee, as well as all

members of The Congress, to understand, and hopefully accept, the fact that accrediting bodies simply cannot monitor an institution's day-to-day compliance with the myriad of federal regulations associated with the administration of financial aid programs. We are concerned about and do insist, as part of the accrediting process, that this area of an institution's operation be capably administered and supervised. We cannot, just as you cannot, legislate honesty of individuals. There have been some abuses in all types of institutions. Accreditation will not stop intentional circumvention of law or regulations.

Accreditation is and should continue to be relied on as a threshold requirement for student aid participation. There always is assessment by the Department beyond accreditation before eligibility is established. Accrediting bodies should not be made responsible, however, for auditing each institution's compliance with those numerous participation regulations.

EDUCATION COMMUNITY INVOLVEMENT

Our institutions and their personnel hold membership in the same national educational groups as do most others--the American Council on Education, the American Association of Collegiate Admissions Officers and Registrars, the American Association of Community and Junior Colleges, the American Personnel and Guidance Association, the Data Processing Management Association, the American Vocational Association, as well as professional individual disciplinary

societies ranging from teachers of English and mathematics to the American Psychological Association. We, as a full partner in the Council on Postsecondary Education (COPA), sit in the same forums with the regional accreditation groups. All our institutions are listed alphabetically by state in the directory, ACCREDITED INSTITUTIONS OF POSTSECONDARY EDUCATION, published annually for COPA by the American Council on Education.

We have a waiting list of persons from throughout the country, both from our institutions and from those accredited by others, who are anxious to be involved in the AICS accrediting process. They receive no pay, they sacrifice their valuable time from their own institutions, and they enjoy being able to work and consult with other institutions around the country.

DENIALS, WITHDRAWALS, AND LITIGATION

A frequent criticism of accreditation--repeated again by attribution in the Carnegie Foundation report--is that nearly all institutions are accredited, that few ever lose accreditation, therefore the process is meaningless. This simply is not true. During recent years AICS has refused to accredit many institutions because they failed to meet criteria. We also routinely withdraw accreditation from institutions that no longer meet the guidelines. Each and every such withdrawal is published.

This rigor of the process has, of course, resulted in litigation. But during our nearly thirty years of existence, the AICS Accrediting Commission has never been prevailed against by a complainant. The courts consistently have decided that our processes and procedures are equitable, fair, non-arbitrary and non-capricious, and in the best interests of the public at large. That is a legal track record of which we are proud and which, more importantly, speaks to the worth of self-regulation as practiced by our institutions.

THE CARNEGIE REPORT

"The Control of the Campus" is a nice essay--historically interesting, well written, and legitimized by an important philanthropic foundation and an impressive list of panelists.

Most of the criticisms of accreditation in the report are not new. Historically when the general economy turns down, accreditation has been criticized. Usually, the severest criticism comes from within--from institutional administrators. This was true in the early 1930s, during the early 1940s, and during the campus unrest years of the late 1960s. It has emerged again in the 1980s.

The old saw by college and university administrators of, "throw the rascals out and regain control of our own destinies," has been voiced again and again over the years. But, only

by a few of them. One is hard pressed to find such criticism coming from faculty and students on the campuses--the very cadre to which the Carnegie panel suggests control should be returned.

The report, both in some of its criticisms of institutional accrediting bodies and in its recommendations to them for improvement, overlooks a basic important tenet. That is, accreditation is designed to evaluate educational practices--not dictate what those practices are to be. While accrediting bodies can be the collective guardian of academic quality, and to a lesser degree, institutional integrity, they cannot cause institutions to be either good or bad. Institutions, as the Carnegie Report suggests, must do that for themselves.

We support some of the recommendations in the report for improvement or at least change. We know some areas already are under intensive study by COPA and we are participating in those efforts.

Some of the recommendations we take exception to as being unworkable or impractical. Specifically, we disagree with the recommendation (p. 82) that, in determining the eligibility of colleges to participate in federal programs, the Secretary of Education should use regional accreditation as the basis for approval. As previously pointed out, regional accreditation accounts for only one-third of the currently accredited and eligible institutions in the country. Was this recommendation

intended to "deeligibilise" more than 6,000 institutions? We certainly hope not. We suggest that the social and political reaction to that from disenfranchised citizens would overwhelm the Congress.

The further recommendation that COPA, not the Secretary of Education, prepare an approved list of regional associations is impractical for the same reasons.

The recommendation to regional associations that they should have their own clear standards of academic quality (p. 77) seems to contradict the overall theme of the report to restore complete academic control to the campus.

Similarly, the recommendation that regional associations should hold campuses accountable for areas of special concern to state and federal agencies and the courts (p. 77), seems to absolutely contradict the concept of self-regulation promoted elsewhere in the report.

Lastly, we would deem it an unnecessary layer of due process for COPA to be a court of last resort to receive appeals and to resolve conflicts between accrediting bodies and their member institutions. COPA's role is to insist through its recognition process that all accrediting bodies have in place and consistently follow an appeals-due process procedure.

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Accreditation has adapted to many educational and societal changes in the past; is adapting today through many activities being sponsored by the Council on Postsecondary Accreditation; wants to be socially acceptable while being educationally accountable; and is more than willing to do its part in what has to be a partnership arrangement to address both human accomplishments and human expectations. It should not, however, assume or be forced to assume responsibility in areas for which it has no authorization or institutional agreement.

We at AICS agree that there are far too many externals affecting our personal and professional lives. There have been far too many social engineers in state houses, the White House, and the halls of Congress during the past quarter century. But, we permitted them to legislate and appropriate in the ever rosier expectations of sharing in the promised commonweal. We at AICS do not apologize for being a passenger on the bandwagon. At the same time, we are not so naive as to believe that postsecondary education in this country can or should ever return to the era of Mark Hopkins and a student on a log. Federal and state bodies have made it possible for millions of Americans to sit on that modern-day log. Accrediting bodies have helped to make the educational experience more meaningful for students. Without both of the foregoing our society would not be as far along in its development.

We at AICS think of ourselves as a full partner in this endeavor. We have tried to be helpful to The Congress in the past, and The Congress has been helpful to our institutions and their students; we have cooperated with the executive branch and will continue to do so; the courts have upheld the legal appropriateness of what we do and how we do it. We, the Association of Independent Colleges and Schools, therefore, proclaim our hard-fought right to be recognized as a contributing member of the postsecondary education community in this country.

Thank you for your time and your attention.

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MEMO
Accrediting Commission

AICS
Association of
Independent Colleges and Schools
Accrediting Commission
James M. Phillips, *Executive Director*
Victor K. Biebighauser, *Assistant Executive Director*

TO: AICS Member Institutions

FROM: Howard Steed, Chairman, Accrediting Commission

DATE: November 12, 1982

SUBJECT: Revised Accrediting Criteria

Enclosed are recent revisions and additions to the Accreditation Standards adopted by the Commission following consideration of all comment received from the members.

Also included are two explanatory documents: "Procedures and Guidelines for Senior Collegiate Institutions Offering Education at the Graduate Level," and "Interim Approved Policy Guidelines for Institutional Grant and Loan Programs." Please note that the latter is still subject to comment from members prior to November 30, 1982.

Please review these materials carefully. All institutions are now responsible for being in compliance with the criteria as revised.

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GRADUATE CRITERIA ADOPTED IN AUGUST, 1982

CHAPTER 5 Standards for Institutions Offering Education at the Graduate Level

3-5-100 NATURE OF GRADUATE EDUCATION

NOTE: These statements are more fully explained in a separate document, "Procedures and Guidelines for Senior Collegiate Institutions Offering Graduate Programs." Institutions wishing to initiate graduate education should request a copy of this publication.

Graduate degree programs may be classified in two ways--research and professional. The research graduate degree prepares students mainly for scholarly or research activity while the professional graduate degree prepares students primarily for specific careers in business and other areas.

The awarding of a masters degree signifies that, in the judgment of the faculty, the student has attained specialized competence which qualifies the recipient for opportunities and additional responsibilities not ordinarily available to the baccalaureate recipient. To make a graduate program distinctive, a component designed to teach research skills should be included.

Because of the varying student groups served and their special needs in terms of flexible instructional approaches and scheduling patterns, instructional latitude is encouraged in developing innovative graduate programs. The graduate program, however, should not be built at the expense of the undergraduate program.

Considerations in developing and maintaining a masters program:

a) The program is consistent with the goals and objectives of the institution.

b) The financial resources required for developing and maintaining the program extend beyond those necessary for an undergraduate program.

c) Quality and depth of instruction requires faculty with advanced degrees and related professional experience.

d) The program should enhance the undergraduate program.

e) The program requires the appropriate administrative expertise to maintain quality.

f) The program requires strengthening of library resources on a continuous basis.

e) The program may require an extension of student services.

3-5-200 ELIGIBLE INSTITUTIONS

a) The institution must be accredited as a senior college by the Accrediting Commission of AICS in order for a masters degree program to be eligible for inclusion within the scope of accreditation.

b) The institution must be authorized by the educationally appropriate state agency, where such authority exists, to legally confer the masters degree.

c) The institution must offer a program which requires a minimum of 30 semester hours, 45 quarter hours, or the equivalent, of masters work with a thesis at the graduate level; or 36 semester hours, 54 quarter hours, or the equivalent, of course work at the graduate level.

d) The institution must demonstrate a need in its geographic area for its proposed program prior to applying for graduate status.

3-5-300 PHILOSOPHY AND OBJECTIVES

The objectives of a masters degree program are an extension of the institution's awareness of its mission to its constituents and to society at large. These objectives are long-range and have a close relationship to the human, physical, and financial resources available to the institution. They relate to the student's mastery of a body of subject matter and an understanding of related research and research methodology.

While program objectives are usually stated in general terms, course objectives should be more precise and directly related to the learning outcomes.

Continuous internal evaluation of program objectives is essential for providing viable graduate education. The attainment of the institution's objectives shall be measured by the productivity and professional performance of its graduates as well as by evaluation of its programs by students and alumni.

3-5-400 EDUCATIONAL ACTIVITY

3-5-401 Graduate faculty must be directly involved in the development and modification of graduate program policies and procedures and in the development and modification of curricula.

The masters degree program is a direct outgrowth of the institution's statement of philosophy and objectives of graduate education and should be structured on a foundation of subject matter from the functional area. Normally, the masters degree program is the equivalent of one calendar year of full-time graduate study and includes the following components:

a) An understanding of the subject matter with sufficient breadth and depth, at the advanced level, that permits the students to further their profession and make significant contributions to society by addressing technological, social, economic, and political issues and problems.

b) An understanding of research and research methodology that contributes to the student's intellectual inquiry and sense of creative independence.

c) An evaluation of the knowledge, skills, and competencies as a means of certifying the student's ability to integrate the bodies of subject matter in (a) and (b).

d) A learning environment that is conducive to the acquisition of knowledges, skills, and competencies at the graduate level.

3-5-500 ORGANIZATION, ADMINISTRATION, AND CONTROL

3-5-501 The responsibility for developing, modifying, and maintaining the graduate program shall be performed by a qualified designated committee. Administration of the graduate program shall be performed by a qualified individual with appropriate administrative and educational background and experience for the direction of a graduate program. The duties of this individual may be full- or part-time with adequate staff support.

3-5-600 FACULTY

3-5-601 The institution shall have an adequate and competent faculty working under conditions that encourage their best efforts. The size of the faculty shall be appropriate for the graduate enrollment. All masters program faculty should have an appropriate graduate degree with a sufficient number possessing a terminal degree. Professional certification is not a substitute for a terminal degree. At least one-half of the graduate level courses are to be taught by full-time faculty and at least one-half of the graduate level courses shall be taught by faculty possessing terminal degrees.

3-5-602 In judging competence of faculty, consideration shall be given to the academic preparation and experience of each instructor. During any academic term, a faculty member shall not be assigned to teach in more than three fields of instruction and preferably in not more than two fields. Instructors shall be assigned in terms of their major and minor areas of academic preparation and related experience. The total teaching load of faculty members teaching one or more graduate courses shall not exceed twelve credit hours per term.

3-5-603 The institution should present evidence of a stable graduate faculty; stability is particularly important for those programs which contain courses of a sequential nature. The institution should also encourage graduate faculty members to engage in scholarly research and to publish in professional journals.

3-5-700 THE LIBRARY AND INSTRUCTIONAL MATERIALS

3-5-701 Institutions offering graduate programs shall provide access to substantially different library resources in terms of their depth and breadth than those required for baccalaureate degree programs.

These resources shall include bibliographic and monographic references, major professional journals and reference services, and research and methodology materials. The breadth and depth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage intellectual development of superior students and to enrich the professional development of the faculty. A librarian with special qualifications to aid in research study shall supervise the library.

3-5-702 Library acquisitions are the joint responsibility of the faculty and library staff, with the greater amount of input emanating from the faculty. Also, it is the faculty's responsibility to inspire, motivate, and direct student usage of the library resources. The ultimate test of the library's adequacy is determined by the extent to which its resources support all the courses offered by the institution.

3-5-800 ADMISSIONS

3-5-801 Admission to a masters program is based on the possession of a baccalaureate degree from an institution accredited by an institutional accrediting agency listed by the United States Secretary of Education or an institutional agency recognized by the Council on Postsecondary Accreditation.

3-5-802 In evaluating applicants, appropriate techniques should be used to determine whether they have the academic qualifications to benefit from graduate study.

3-5-803 Transfer of credit for appropriate graduate level course work from another institution may be granted according to the policy established by the institution. (Institutions are encouraged to follow the guidelines on transfer and award of academic credit developed by the Council on Postsecondary Accreditation, the American Council on Education, and the American Association of Collegiate Registrars and Admissions Officers.)

3-5-804 Admissions procedures, transfer policies, and requirements for graduation shall be stated in the college catalog and shall be consistent with the overall philosophy and objectives of the institution.

3-5-900 PUBLICATIONS

3-5-901 There shall be a separate section in the institution's catalog describing the masters degree program requirements, regulations, and course descriptions.

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Section 1-3-103--Senior Colleges

Because graduate criteria were adopted, the definition of senior colleges was expanded to include graduate program offerings within the scope of the institution's accreditation and will read as follows:

1-3-103--Senior Colleges

A senior college is a four-year collegiate institution devoted predominantly or substantially to education for business at the collegiate level. Such institutions offer programs of four academic years in length leading to an appropriate baccalaureate degree, and may be responsive to community needs by also offering occupational, specialized adult, remedial, or continuing education programs. Senior colleges may also offer programs leading to a graduate degree.

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1-4-101--Non-Main Campus Educational Activities

A revision to 1-4-101 (a) Branch Campus is editorial in nature and technically clears up what in practice has been an inconsistency with another section of the Standards. The change permits without conflict an institution to operate and the Commission to evaluate a branch campus that is single-purpose and, perhaps, all technical.

The change deletes the former references that a branch campus has to meet the eligibility requirement that it will be able to seek accreditation in its own right which would have required it to have been predominantly business in nature from its inception.

That particular eligibility requirement still will have to be met by the branch before it can be evaluated by the Commission to be a free-standing institution following two years of operation.

The new language reads as follows:

(a) Branch Campus. A branch campus could be distinguished by such characteristics as: offering a complete program leading to an occupational objective or academic credential; exhibiting the ability, except for the remoteness of ownership and control, to meet the requirements of the evaluative criteria in Title III of the Standards; and having a significant amount of local responsibility for administrative control and academic affairs.

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3-1-421--Scholarships, Institutional Grants, Institutional Loans, and Financial Aid

This section replaces existing 3-1-421--Scholarships and Financial Aid. It clarifies how the Commission will treat this area of an institution's activities. With many institutions wanting to offer some institutional financial aid to deserving students in the form of grants and loans rather than scholarships, the proposal will permit that within the parameters set forth. Institutions are also referred to the Interim Approved Policy Guidelines adopted by the Commission concerning acceptable characteristics for such institutional programs.

(a) With the prior review and approval of the Commission, institutions may participate in scholarship, institutional grant, and institutional loan programs which acceptably reflect the dignity and integrity of the institution so long as the ethical application of those programs falls within the publicly and generally accepted meaning of the terms "scholarship," "grant," and "loan."

(b) Scholarship, institutional grant, and institutional loan programs shall be printed in the current catalog of the institution with full disclosure of the terms, conditions, source, application procedures, deadline dates, basis for selections, number (scholarship only), maximum and minimum awards (scholarships and grants only), and aggregate award volume (scholarships and grants only).

(c) Financial aid (such as grants, loans and work-study programs supported by outside sources such as private organizations or state and federal governments and supervised by an institution) may be offered so long as they are administered within the guidelines established by the funding source. It is the responsibility of the institution to clearly identify, in all its publications and by all its actions, the distinction between the publicly and generally accepted meanings of the terms "scholarship," "grant," "loan," and "financial aid."

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PROCEDURES AND GUIDELINES FOR SENIOR COLLEGIATE INSTITUTIONS OFFERING EDUCATION AT THE GRADUATE LEVEL

These procedures and guidelines have been developed to assist the senior collegiate institution in preparing for graduate programs to be included within the scope of accreditation of the institution. Attention is given to those areas of importance which focus on the quality and relevance of the program under review. The institution should maintain close consultation with the Commission staff while undergoing the accreditation process.

PROCEDURES

The institution must notify the Executive Director of the Commission at least six months prior to initiating a graduate program. Following notification, the institution must prepare and submit for review by the Commission a report on the graduate programs. (See GUIDELINES of this publication.)

Upon acceptance of the graduate program report, the Commission may grant an interim inclusion within the scope of the institution's accreditation for a period not to extend beyond two years. During the interim inclusion, a follow-up evaluation will be scheduled. This evaluation will assist the Commission in ascertaining the overall quality and effectiveness of the graduate program while it is in operation. When final approval is given by the Commission, the graduate program will be included within the scope of accreditation of the institution and, thereafter, be reevaluated at the time of the normal accreditation schedule of the institution.

GUIDELINES

The following requirements have been established by the Commission and must be addressed in the graduate program report.

1. Statement of Rationale for Offering the Graduate Program.

   This statement should explain the relevance of the graduate program to the professional development and awareness of the graduate student as well as the impact the program may have on the institution and the community, including any market surveys conducted.

2. Curriculums for All Graduate Programs.

   The copy of each graduate program curriculum must include:

   a. Objectives of the program;

   b. Program outline;

c. Listing of all courses showing credit allowed for each;

d. Thesis requirements; and

e. Total amount of credits required for completion of the program.

3. Evidence of State Authorization.

Documented evidence must include specific state authority, unless the law is silent, for the awarding of graduate degrees by the institution.

4. Information on the Person(s) Responsib.e for Administering the Graduate Program.

Documentation supporting the qualifications (educational background and experience) of the administrator and the administrative staff must be submitted.

5. Information on Faculty.

The following items must be included for all full-time and part-time graduate faculty:

a. Official transcripts, including evidence of degree(s) obtained;

b. Experience, other than academic, evidencing qualifications to teach at the graduate level; and

c. Contractual arrangements, including credit hour teaching requirements.

6. Library Development Plan.

The institution should indicate what measures are being taken to develop or expand its library resources to meet graduate-level criteria.

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MEMO
Accrediting Commission

AICS
Association of
Independent Colleges and Schools
Accrediting Commission
James M. Phillips, Executive Director
Victor K. Biedenhauser, Assistant Executive Director

TO: AICS Accredited Institutions and Interested Parties

FROM: Accrediting Commission

DATE: September 16, 1982

SUBJECT: Interim Approved Policy Guidelines for Institutional Grant and Loan Programs

The Commission recognizes that accredited institutions may desire from time to time to offer programs of institutional financial assistance to students. The Commission also has a responsibility to its various publics to set appropriate guidelines for such programs in order to insure their legitimacy. Accordingly, any institution desiring to offer any institutional grant or loan program will be required to submit the details of any such program to the Commission for prior review.

In reviewing proposed programs of this type, the Commission will consider the characteristics listed below. These characteristics are not listed in any priority order. Any institution whose grant or loan program is not in accordance with any or all of these characteristics may be subject to a directive by the Commission to show cause why its program is acceptable and why its grant of accreditation should not be suspended, revoked or otherwise conditioned. The greater the number of these characteristics evident in an institution's grant or loan program, the greater the presumption of acceptability. However, the Commission will review each institutional grant or loan program in its entirety and not based solely on its individual parts.

1. The grants or loans are made from identifiable and segregated funds of the institution.

2. The percentage of students receiving institutional grants or loans, as compared to the overall student population of the institution, is not inordinately high.

3. The total amount for institutional grants is publicly and clearly identified prior to the beginning of the academic year or term.

4. The amount of the grant or loan varies according to the individual financial need of each student receiving the assistance.

5. The amount of the grant or loan is not based solely on the difference between the tuition charged and the amount of federal or state financial aid received.

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6. The tuition charged reasonably and closely represents the cost to the institution of the coursework provided and does not significantly vary in amount from a similar or same course provided in another certificate or degree program.

7. The amount of tuition retained as non-refundable by the institution from those students who drop out prior to the end of the academic term or period is proportionately allocated between the institutional grants or loans and the federal and state financial aid received.

8. The collection of institutional loans is pursued in an aggressive and systematic manner, based on sound business practices, for all student borrowers.

9. The type and amount of institutional aid provided is determined by an independent selection or review panel.

10. Any specialized or contractual programs, for which an institutional grant or loan is utilized, are not open to the general public.

These Interim Approved Policy Guidelines are effective immediately and will remain in effect pending a further review by the Commission at its December, 1982 meeting. Any accredited institution or interested persons or parties desiring to comment on these guidelines are encouraged to do so. Any comments should be addressed to the Commission and should be received in the Washington office prior to November 30, 1982.

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Mr. SIMON. Thank you. If I may just follow up, I did not quite understand. You said there are two other ticket punches. What are the two other ticket punches you are referring to?

Mr. PHILLIPS. The institutions, once accreditation is achieved by an institution, that institution must then take that fact, first of all, to the eligibility section in the Department, where it gets evaluated, and then specific program participation agreements have to be carried out with another section within the Department so that until those three places have been assured, until approval from those three have been assured, the eligibility really has not been established.

Mr. SIMON. Does your association, which, as you point out, represents two-thirds of the accrediting institutions, you have any—do you work with the Council on Postsecondary Accreditation at all?

Mr. PHILLIPS. Yes; very closely. We were a charter member of that organization.

Mr. SIMON. Does the Carnegie recommendation suggesting that they have, in fact, assumed much of the work the Secretary now does, does that make sense to you or does it not?

Mr. PHILLIPS. I think there is some middle ground there. The problem is that, and again, it came out in the testimony on Tuesday, the Secretary recognizes and lists so many more accrediting bodies than are presently recognized or have been evaluated by COPA. I do not know how you resolve that dilemma if that should occur.

I think, as Dr. Manning indicated, there are so many intricacies in trying to untangle some of these things, ideally maybe that could be done at some point in the future. But I do not think that it is reasonable to believe that it could be done very quickly.

Mr. SIMON. Dr. Manning and Dr. Sweet, my apologies for not being here when you testified. I may be asking you to go over, in fact, I guess I am asking you to go over some testimony you have already offered.

If either of you suddenly became the member of this subcommittee or Secretary of Education and you could just wave a magic wand and you could do three things to improve the accreditation process, what would those three things be?

Mr. MANNING. Gordon, you are older than I am. [Laughter.]

Well, Mr. Chairman, one of the principles that I try to guide my life by is, if it works, do not fix it. I think one of the points that needs to be emphasized here is that over the 30 years that the present system has been in place and has evolved, it has worked really quite well for the purposes for which it was intended.

It was not intended as an arrangement of having accrediting agencies or other persons not directly connected with the Federal Government to monitor the compliance of institutions with specific regulations or requirements. It was intended to provide a basic assurance to the Federal Government that its funds were being expended in or for the benefit of institutions of reasonable and acceptable quality. That has been the case, by and large, over 30 years. There have been individual exceptions, but individual exceptions will occur in any kind of human enterprise.

The actions that the Secretary takes in examining the accrediting agencies, I think, are proper. The only suggestion that I would make is one that appears in my testimony, that I think a degree of cooperation which is possible within the framework of existing statutes between COPA, Council on Postsecondary Accreditation, and the Secretary, could reduce the administrative burden on the accrediting organizations.

But I think no basic change in the statute is necessary, or indeed desirable.

Gordon.

Mr. SWEET. I think over the years that we have regretted but we have certainly cooperated and participated in the use of regional accrediting for eligibility for Federal funding. I think this has made accreditation sometimes a little difficult in dealing with institutions, although I believe that we are now so set into this route that there is no way to change it.

In my span of experience, earlier it was somewhat of a struggle at times to give advance recognition to institutions and so on without really going through some of the process that we wanted to because we regretted that the institution could not get the funds that might be available. It has presented some difficulties.

I think that is the purposeful one. The other is that we always can use more money and more people to do a bigger job. I believe that is it.

Mr. SIMON. OK. Then one final question if I can address this to the two of you and also to Dr. Carpenter, who has the practical experience at an institution. Should the Department be involved in accrediting the engineers association and the journalism association and all of the umpteen various groups that we do, and specifically to you, Dr. Carpenter, does that present a problem when you are trying to run Memphis State University?

Incidentally, you are at Memphis State, you are getting close to my district. My district is deep southern Illinois. I am a heck of a lot closer to you than I am to Chicago.

Mr. CARPENTER. Well, earlier when there was a reference to a problem, I assume it came out, perhaps journalism or something of that nature, specialized accreditation, I will have to admit that we do have some problems with those areas. I am not sure, though, that we should attempt to solve them through the Federal Government. My feeling is that except in rare instances, the presidents of the institutions themselves should take this on as a task and resolve it.

Mr. SIMON. If I may press, at the present time, the Federal Government is involved to the extent that we recognize these various associations. They come to you and say, you know, you have to do this, that or the other thing or you are going to lose your accreditation.

Mr. CARPENTER. Well, I will cite as an example the military, for instance, will not commission a nurse who has not graduated from an LN-accredited program. That sort of thing creates some problems with us because we sometimes disagree, and I will not select NLN, but we sometimes disagree with the specific criteria which we believe infringes on the autonomy of the institution unnecessarily.

We would hope, though, that those in the profession in nursing or in law or in any of these others would understand the problem and work with us. I have no objection to the Federal Government recognizing that, but there is something in between those two that needs some correction in our opinion.

Mr. SIMON. Any comments either of you wish to make?

Mr. MANNING. I think, Mr. Chairman, that if the Federal Government has a program or process of recognizing or listing accrediting bodies, as it does, and for good reasons, then it is essentially impossible for it to exclude from that process accrediting bodies that seek to be recognized, because one cannot claim that you could recognize only the bodies whose accreditation is necessary because the accreditation may not be necessary until after they are recognized.

Essentially, you would have to have an open door. I do not think there is any way of getting around that. Insofar as this impinges upon the institutions, I think this comes back to the theme of the Carnegie Foundation report, the institutions themselves need to take responsibility. I speak as a person who has been a president and a dean and a vice president in several institutions.

There is no cachet provided by the recognition of the Secretary of Education that prevents any institution from saying to a specialized agency or to an institutional agency, we do not wish to be connected with you.

Indeed, within the last year, two major universities have told one of the specialized agencies, we no longer wish to have our program accredited by you, goodby. That agency is recognized by the Secretary and the Secretary's listing of that agency does not present any barrier or problem to the institutions if they pull up their socks and do something.

Mr. SIMON. All right. I guess that is a good practical phrase on which to end that testimony.

Mr. Coleman.

Mr. COLEMAN. I was wondering if each of the three of you could briefly outline what happens if you receive complaints by either students or the general public about the academic quality of an institution that you have accredited in the past. How do you handle that, and do you wait until the next 5 or 10 years go by before you do something about it? Just briefly, how do you handle something like that?

Mr. MANNING. Our complaint procedure runs along these lines. We first of all have certain criteria with respect to whether the complaint is valid. It must be written, it must be signed, the complainer must know that we will share it with the institution. Occasionally, we get, well, not occasionally, I guess about half the time we get anonymous complaints where the complainers says, well, I do not feel strongly enough to do anything, so that passes out.

When we get a valid complaint, the first thing we do is to share it immediately with the chief executive officer of the institution for the comments of the institution on the complaint.

Based upon that response so that we have the complaint and the institution's response to it, the staff can then make a judgment as to whether further examination is necessary, whether the complaint has been resolved, whether the complaint is valid.

If further examination is necessary, we will send a team. We do not wait for the next 5 years. Interestingly enough, most of the complaints that we get turn out to deal with either individual problems, that is, someone feels they have not been properly paid for services rendered, which falls outside our scope of activity, or they are complaints where something has happened deep down inside the institution and as soon as the president finds out about it, things are resolved and the complaint is solved without further attention.

Mr. SWEET. I think this is probably the procedure of all the regional associations. We do deal with those immediately, particularly through the chief executive officer. Sometimes I much prefer just to throw them in the wastebasket. One I received yesterday was from a parent, who obviously knows much more about computers than his daughter's instructor does, and so he feels that the daughter is not getting proper instruction in the computer because she is not learning all the things that he knows.

This is a sort of a complicated one, because I gather that he is a rather important person somewhere, some engineering firm, I suppose, but we will take that up with the president and look into it.

Mr. COLEMAN. Dr. Phillips.

Mr. PHILLIPS. Our procedure is similar, Mr. Coleman. No complaint goes unanswered longer than 24 hours by my directive to staff. The institution is informed of the complaint, asked to respond within 10 days to us. We try to resolve all complaints from either students, parents, faculty at the institutions, by the way, or other institutions with a 30-day period to the satisfaction of all parties.

Mr. COLEMAN. I note in your testimony that you say that you have never lost a legal case over accreditation. Is litigation a frequent byproduct of your review process for the others, and have you also a 100-percent track record in that? If not, what happens when somebody feels strong enough to file a lawsuit against you? I cannot imagine that that does not color the relationship for some time down the road.

How do you handle that?

Mr. SWEET. It would be colorful, there is no doubt about that.

Mr. COLEMAN. Colorful.

Mr. SWEET. But we find that the cost of the due process procedures, the appeals procedures that all of us have in the regional associations, really pretty well take care of this because they can keep right on moving up and if the last resort would be to go to the courts, and at the present time, we, even though we have been threatened, it has not happened. We have a long history of accreditation in the southern region.

Mr. COLEMAN. Dr. Manning.

Mr. MANNING. Yes; our situation, I think, is similar. We were last sued in the late 1960's by Parsons College when we revoked accreditation from Parsons College. Before that, it was in the 1930's when we were sued by the State of North Dakota for revoking the accreditation of North Dakota State University or State College, as it was then. That is a celebrated landmark case known as the Langer case, after the former Governor. But in the meantime, I think our own internal procedures have strongly improved, as Dr. Sweet has indicated, and this problem is not a serious one.

Mr. SWEET. We have had a couple of Governors who did not want to sue us, they just wanted to kick us out of the State.

Mr. SIMON. How do you set your fees to institutions that you review? Do they pay you a certain amount of money? Is it a membership fee? How do you handle that?

Mr. MANNING. We have two sources of charges to the member institutions. One is an annual membership dues. We are a membership organization, incorporated in the State of Illinois, and the members are the institutions. So, there are annual membership fees.

Mr. COLEMAN. Is that set by size of enrollment?

Mr. MANNING. Yes; in our case, it is.

Mr. COLEMAN. What would be typical for a large and for a small school?

Mr. MANNING. The smallest is an institution below 500 persons, the membership annual dues at this point is $360. For the largest institution above 10,000, it is, I believe, $1,310. These are small, they have increased by 5 percent since 1975. They have not moved strongly there.

We also, however, charge an evaluation fee. This is a flat fee, depending upon the number of days the team is present in the institution and the size of the team. This is looked at and adjusted annually so that over the whole group of evaluations, the evaluation fees pay for these direct costs of the evaluation.

This means that the institution knows in advance, since it is a flat fee, what it will be, and it also means that the commission does not profit from this activity.

Mr. COLEMAN. Typically, what kind of ballpark figures would you give, is that possible?

Mr. MANNING. Yes; I can say that in general it would run about $2,500 for a typical team for a 3-day visit.

Mr. COLEMAN. And that occurs in what intervals on a campus?

Mr. MANNING. In our situation, it depends upon the institution. We must reevaluate an initially accredited institution within 5 years. If we reevaluated it, it must be reevaluated again within 10. Actually the time interval is set individually for each institution, based upon a judgment made through the previous evaluation of the rate at which change is occurring or should occur in the institution. Rapidly changing institutions are evaluated more frequently.

A few institutions, therefore, are visited as frequently as every other year, all candidate institutions are, for example. And large, stable institutions, such as the University of Illinois, Champaign-Urbana or Nebraska are visited once every 10 years.

On the average, we are now visiting our institutions about every 6 years, more than half are on the less-than-10-year review cycle.

Mr. COLEMAN. Are all of you set up not to make a profit; in other words, you are a not-for-profit organization that is chartered that way?

Mr. MANNING. We are chartered that way, yes.

Mr. COLEMAN. And you have a tax-exempt status?

Mr. MANNING. Yes; we are a 501(c)(3) organization, incorporated in Illinois, and as one of our requirements, a full set of audited fi-

nancial statements must be published to all the members, indeed to the public, in our journal each year.

Mr. COLEMAN. I thank you. I said the other day that this is a rather mystical area of higher education I am glad to see some of the mystics come forward. I had some calls made back to my district to see if there were some questions that some campus administrators might like to have asked of you this morning and I was surprised that the response was maybe in the past they may have had some questions, but through internal procedural changes, that they were delighted and happy, very much so, with Dr. Manning's organization, where I come from.

At least you have satisfied your constituency there.

Mr. MANNING. That is important.

Mr. COLEMAN. I have been very impressed with all of your testimony and thank you very much.

Mr. SIMON. I thank you, too. I join Tom, it has been an educational process for me just to learn a little bit more about how all of this takes place. We appreciate it very much.

Dr. Phillips, if we want to complain about your general counsel, do we do that to you, personally? [Laughter.]

Mr. COLEMAN. Wait until he loses a case.

Mr. SIMON. OK.

Mr. PHILLIPS. Our new general counsel has not been tested yet.

Mr. SIMON. Let me also invite any accrediting associations that have not had the opportunity to present oral testimony, we would be happy to have any testimony they might wish to submit entered into the record. They should submit that fairly soon if you want it entered into the record.

Again, we appreciate the contributions that all of the witnesses have made, and will be asking follow up questions for the record.

The hearing stands adjourned.

[Whereupon, at 11 a.m., the subcommittee was adjourned, to reconvene subject to the call of the Chair.]

[Additional materials submitted for inclusion in the record follow:]

AMERICAN COUNCIL ON EDUCATION
Office of the President

MAR 9 1983

March 3, 1983

Mr. Paul Simon, Chairman
Congress of the United States
House of Representatives
Committee on Education and Labor
Subcommittee on Postsecondary Education
320 Cannon House Office Building
Washington, D.C. 20515

Dear Paul:

In response to your request of February 22, 1983, I am pleased to enclose my response to the list of questions accompanying your letter.

I appreciated the opportunity to participate in the hearings and to submit these additional responses for the record.

Cordially,

J. W. Peltason

JWP/gtk

One Dupont Circle, Washington, D.C. 20036-1193
President (202) 833-4710 Vice President (202) 833-4712

Responses to Questions Submitted
By the House Subcommittee on Postsecondary Education

Reference: Subcommittee Hearings
on Accreditation

Question 1.

You state that Federal policy and procedures have already "gone a step too far in bolstering the role of specialized accrediting agencies." What role do you see, if any, for specialized accrediting agencies? Along this line you suggest that COPA should be responsible for national recognition of these agencies; if a specialized agency receives COPA's approval, why is that different from Departmental approval?

I see a very limited role for specialized accrediting agencies in the establishment of eligibility for federal funds. Federal funds go to the institution, not to the specialized unit or program; and the statutory references to accreditation in almost every instance are to institutional accreditation. Status granted by a specialized agency should only be used to establish eligibility for federal funds when it is the only accreditation held by a freestanding special purpose institution.

The question of COPA approval versus Department approval for specialized accrediting agencies goes to the heart of self-regulation initiatives of higher education. COPA is higher education's agency to foster and assure good practices in accreditation. The COPA recognition process is the basis for colleges imposing voluntary sanctions against agencies failing to comply with the code of good accrediting practice established by the academic community. The Department's list serves no such purpose. The Department's list was established only as a listing of accrediting agencies to be used in determining institutional eligibility, for certain federal funds.

Under present policy and practice, a specialized agency can attain recognition by the Department without first gaining the approval of COPA. This undercuts the effectiveness of higher education's self-regulation efforts.

Holding "national recognition," a concept imbedded in the recognition criteria of the Department, should mean having formally been recognized by academic peers (COPA recognition) if self-regulation efforts are to be supported and to succeed. The mere fact that the Department's recognition process is a government activity makes it markedly different from self-regulation initiatives even though academics are used in an advisory capacity.

Questions 2 and 3

While it is clear from your testimony that you favor nongovernmental accreditation of colleges and universities, it is not clear whether you fully support the Federal government's withdrawing totally from approval of accrediting agencies. Do you feel that COPA should have the final say in approving accrediting agencies? In what ways do you feel that the current procedure for Federal government approval of accrediting agencies is detrimental to campuses or to self-evaluation by the academic community? Do you have any suggestions for changing the system--other than totally eliminating the Federal role--which might improve the system.

Certainly I believe, for reasons just stated above, that COPA should have the principal and initial say and no agency should receive Department recognition without first having COPA approval. Moreover, as I view the present recognition processes now operated by COPA and the Department, they are essentially the same. The results have been different because some agencies have sought and obtained Department approval without first seeking and obtaining COPA approval. Therefore, the Department's list is more inclusive than COPA's. In keeping with the principles stated above, the Department's list should not contain any agency not first approved by COPA.

Moreover, few extra assurances relative to the capabilities of accrediting agencies are provided by the Department's recognition procedures that are not provided through COPA's list of recognized agencies. If it is good public policy (we strongly support the premise that it is) for the federal government to rely on nongovernmental accreditation to establish the educational quality

of institutions seeking eligibility for federal funds, I believe that it follows that it is good public policy for the federal government to mainly rely on nongovernmental recognition procedures to determine which agencies should be used to establish eligibility.

As stated above, the principal problems with Federal governmental approval of accrediting agencies is that it results in some agencies being recognized that do not have COPA approval. This factor provides some leverage that specialized agencies use to undercut our own COPA procedures. These problems could be eliminated by some modifications in the Federal role.

First, the federal criteria for recognition should be changed to require COPA recognition as a condition of being included in the Department's list.

Second, the Department should limit its recognition process to special requirements not covered by the COPA recognition process.

There may be rare instances when there should be exceptions to the above. If so, they should be made with the advice of the Department's Advisory Committee and with the consultation and concurrence of COPA.

J. W. Peltason, President
American Council on Education
March 3, 1983

BEST COPY

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS
795 Peachtree Street, N.E. • Atlanta, Georgia 30365
Phone 897-6100 Area Code 404

MAR 10 1983

March 4, 1983

Mr. Paul Simon
Subcommittee on Postsecondary Education
Committee on Education and Labor
U. S. House of Representatives
320 Cannon House Office Building
Washington, D. C. 20515

Dear Mr. Simon:

Thank you for your letter of February 23, 1983 in which you invited me to respond to several questions concerning accreditation. Enclosed are my responses to the questions you have asked.

I appreciate this opportunity and hope you will contact me again if further information is needed.

Sincerely,

Gordon W. Sweet
Executive Director
Commission on Colleges

GWS/ml

Enclosure

BEST COPY

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS
795 Peachtree Street, N.E. • Atlanta, Georgia 30365
Phone 897-6100 Area Code 404

March 4, 1983

1. Do you feel that special program accreditation (excluding professional schools) is necessary or appropriate even though your association has already accredited the institution?

   It has long been our policy that it is an institution's prerogative to determine the extent to which it involves itself in the review of programs by specialized accrediting agencies. Many of our institutions' presidents would agree, however, that there have been problems with specialized accrediting agencies. The requests of these agencies are often considered unreasonable and as undermining institutional autonomy. Programs with specialized accrediting, because of their support by the accrediting agency, are often able to compete more vigorously for limited institutional resources, thus affecting the overall academic balance of the institution. The numerous accrediting teams, with the concomitant expenditure of staff time and funds for self-studies, make it difficult for institutions, especially when funding is tight.

   In our evaluations of institutions according to our standards we give attention to broad areas of curricula and the resources and faculty available for academic programs. In instances where an institution either does not have program accreditation, or has not had a recent committee visit in the specialized program area (nursing, social work, allied health, engineering, etc.) we will usually put evaluators on the team to look at those areas in light of our standards. Institutions may, and often do, schedule specialized accrediting visits to coincide with the visit of our regional accrediting team.

   Whether regional accreditation would suffice or is appropriate in lieu of program accreditation is a question which ultimately and appropriately needs to be answered by our accredited institutions.

2. Dr. Ambach testified that he feels state accreditation is a viable activity. Do you believe there is <u>ever</u> a need for the states to establish approval processes?

   There may exist a need for states to establish state approval mechanisms in cases where state funds are provided to institutions which are not accredited by a recognized accrediting agency. State involvement in regulation of accredited institutions presents the possibility of politically

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motivated erosion of institutional autonomy. Not only would a system of state regulation or accreditation be a threat to institutional autonomy, but it would introduce another layer of evaluation into the process of assuring academic quality. Also, higher education is increasingly mobile, operating in many instances across state boundaries. Regional and national accrediting, being nongovernmental and able to conduct evaluations freed from local concerns and biases may be in a particularly favorable position to deal with this mobility.

3. Can you give us some examples of Federal criteria for accrediting agencies that you object to?

Regional accrediting commissions of higher education have traditionally been concerned with maintaining standards of quality in accredited institutions and with promoting institutional self-improvement. Congress recognized the validity of this function in 1952 when the Commissioner of Education was authorized by the Korean War G.I. Bill to list the regionals and other nationally recognized accrediting associations that were determined to be reliable authority as to the quality of training offered by an educational institution. This authorization assumed that there existed such private associations and that reliance on them would lessen the threat of federal control of education. This legislation was intended to avoid the direct regulation of educational institutions, with the assumption that the federal government would not do this indirectly by regulating the accrediting associations. This was the situation from 1952 to 1968: the Commissioner consulted advisory groups of educators, some of which were drawn from the accrediting community, in making determinations as to which accrediting associations had gained acceptance in the higher education community and should be placed on the Commissioner's list.

The initial 1952 criteria for recognition, developed in consultation with the higher education community, were not revised until 1969. This revision, and others which have followed, have expanded inappropriately upon the procedures that accrediting agencies must employ, even to the extent of specifying the manner in which an institution should conduct its own self-study.

The criteria have also required accrediting agencies to "foster ethical practice" such as equitable student tuition refunds and nondiscriminatory practices in admissions and employment within accredited institutions. These types of provisions are an attempt to regulate institutions through accrediting agencies and move accrediting associations away from their traditional role into that of law enforcement agencies. In the 1970's it was proposed, in addition, that the Commissioner make a determination that an accrediting association was reliable authority as to the "probity" of its accredited institutions. Fortunately, this was not incorporated into the criteria. The criteria also have mandated that an accrediting association "encourage experimental and innovative programs." This requires that an

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accrediting association demonstrate that it is a change agent before it can be listed.

We believe that the criteria have gone well beyond congressional intent and statute. It was not, nor do we believe it is now, the intent of Congress to grant to the Department of Education, through its Eligibility and Agency Evaluation Staff, the authority to regulate directly the accrediting associations and therefore to regulate indirectly postsecondary institutions. We are hopeful that steps can be taken to deal with these concerns which affect not only the accrediting associations, but all of postsecondary education as well.

4. Do you feel that there should be any role for the Federal government in accreditation?

There should be no role by the Federal government in the accreditation of institutions. Our colleges would support no move in this direction. The current role of the Department of Education in listing recognized accrediting associations should be modified to allow increasing reliance on the recognition process of the Council on Postsecondary Accreditation and to reduce the inappropriate expansion of the criteria for recognition.

5. How many schools that apply for accreditation through your association receive it? How many schools lose accreditation during your review process?

If we assumed that there were no regional accrediting association in the South we could be certain that the number of postsecondary institutions would be far more numerous than is currently the case. Many institutions never reach the nascent stage because of accrediting requirements which exist down the road and without which accreditation the institution would have a difficult time attracting students. This is the initial screening device.

Ongoing institutions that apply for accreditation have in many cases been in existence some time and have gone through a development stage. Some of these (medical colleges, art colleges, seminaries, bible colleges, business colleges, for example) may already have accreditation through another accrediting agency. When institutions contact us concerning accreditation they may receive advice which indicates that they are not ready to apply.

These factors serve somewhat as screening devices so that, of the institutions which actually do apply, the great majority eventually earn accreditation. The candidate stage, before accreditation, offers an institution an additional opportunity to correct weaknesses. Institutions may remain in candidate status up to six years.

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There are very few institutions which lose their accreditation during the review process. Quite a few institutions are placed on notice or probation and most manage to correct deficiencies cited during the review process. Only one institution was dropped from membership during the last few years and it was reinstated in probationary status after an appeal.

Gordon W. Sweet
Executive Director
Commission on Colleges
Southern Association of Colleges and SChools

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NCA

North Central Association
of Colleges and Schools
Commission on Institutions
of Higher Education

159 North Dearborn
Chicago, Illinois 60601
(312) 263-0456

MAR 7 1983

March 2, 1983

Representative Paul Simon, Chairman
Subcommittee on Postsecondary Education
House of Representatives
320 Cannon House Office Building
Washington DC 20515

Dear Representative Simon,

Thank you for the opportunity to testify before your committee on February 10, and to provide further information in response to your questions received on February 25.

For convenience I have provided responses to the questions on separate sheets, which are enclosed. I would of course be glad to provide any further information that might be desired by you or your committee.

I appreciate your courtesy and the cordial interest of the committee during my testimony. Please let me know if additional information is desired.

Yours sincerely,

Thurston E. Manning
Director of the Commission
on Institutions of Higher Education

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Responses to Questions from the
House Subcommittee on Postsecondary Education

Thurston E. Manning
Director of the Commission on Institutions of Higher Education
North Central Association of Colleges and Schools
159 North Dearborn Chicago IL 60601

March 2, 1983

Note: The responses represent the personal views of the responder, and are not officially approved statements of the North Central Association of Colleges and Schools.

1. Do you feel that special program accreditation (excluding professional schools) is necessary or appropriate even though your association has already accredited the institution?

   Response:

   Yes. Program accreditation provides a detailed examination of an individual program, which is not provided by institutional accreditation. Such detailed examination is important for programs training practitioners for fields bearing on public health and safety (for example, medical technicians trained in community colleges). Program examination can also be helpful to institutions that wish the external consultation provided in the field; while it is possible that an institution could arrange for its own examinations, having an evaluation program readily available saves time and money for an institution and also gives better assurance of a thoughtful evaluation than does an ad hoc arrangement.

   When the Federal government has provided funding for specific programs (or for students in specific programs) it is appropriate for it to require such programs to meet the special standards of program accreditation.

   The difficulties institutions have experienced with program accreditation fall into three principal areas: First, on occasion program accrediting standards have been rigid and rigidly applied, inhibiting or preventing useful innovations by individual institutions. Second, when state statutes and regulations require graduation from an accredited program for licensure of individual practitioners an institution cannot depart from the specific standards of the program accrediting body, even if the institution believes departures to be desirable. Third, the increase in the number of programs subject to accreditation has placed a burden on institutions. The Council on Postsecondary Accreditation has undertaken work in these areas, and I am hopeful that appropriate relief will occur.

2. Dr. Ambach testified that he feels state accreditation is a viable activity. Do you believe there is ever a need for the states to establish approval processes?

   Response:

   Yes. There are two distinct needs to be served by state approvals:

The first is establishing a minimum acceptable level for the operation of educational institutions within a state. Since accreditation is voluntarily sought by institutions it cannot speak about the operations of institutions that do not seek accreditation. The reasonable protection of citizens from unscrupulous operations is a legitimate activity of the state, and it is appropriate for a state to establish and enforce through its police powers minimum requirements to be met by all institutions, whether or not they seek accreditation. In my opinion, some states go well beyond providing such basic consumer protection, and impose requirements that inhibit or prevent reasonable variety in institutional operations — sometimes to the benefit of in-state institutions and to the detriment of citizens who are thereby denied the benefits of alternative educational institutions or programs. Some believe that no special requirements for educational institutions are needed, since statutes dealing with fraud and misrepresentation can be used to drive out undesirable operations. There are examples of effective use of such statutes, but in general states have been slow to utilize them against shady educational operations.

The second need arises when the state provides substantial financial assistance to private institutions or students. In such cases (the State of New York is a prime example) it is appropriate for the state to establish additional reasonable institutional and program requirements for access to state financial assistance.

States obviously have a concern for coordination of state-operated colleges and universities, but this coordinating activity should be distinguished from approvals required of all institutions, private and public.

3. Can you give us some examples of Federal criteria for accrediting agencies that you object to?

Response:

No. While the wording and organization of the criteria could be improved, I find nothing in their content that should be objectionable to a well-run accrediting body. If the Federal government is to rely on the decisions of accrediting bodies it is appropriate for it to have assurance that those accrediting bodies conduct their activities well.

4. Do you feel that there should be any role for the Federal government in accreditation?

Response:

Yes. The present Federal role of using accreditation as a threshold requirement for funding eligibility is highly desirable, and the associated role — examining accrediting bodies against reasonable criteria to help insure that the accreditation meets the Federal eligibility needs — is appropriate. The Federal government also provides, through the Fund for the Improvement of Postsecondary Education, a funding source for improvement of accreditation; FIPSE is currently funding a joint project of the Council for Postsecondary Accreditation and the State Higher Education Executive Officers organization directed at providing to accrediting and state approval bodies assistance needed in dealing with institutions operating at many locations through the use of modern telecommunications.

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I believe it is inappropriate for the Federal government to take a direct role in accreditation, either by itself undertaking accrediting activities, or by providing an approval of accrediting bodies beyond that directly needed for Federal purposes.

5. How many schools that apply for accreditation through your association receive it? How many schools lose accreditation during your review process?

Response:

Data responding to these questions need to be interpreted in the light of our practice. "Applying" for accreditation is not simply a matter of sending in some information. We regard the submission of a completed institutional self-study document as the formal application. The following steps outline the process; note that there are several steps before an application for accreditation is made:

a. The institution provides for staff analysis written materials bearing on whether the institution meets North Central's General Institutional Requirements.

Between March 1, 1982, and February 28, 1983, we received inquiries from 101 institutions and responded by providing each with the General Institutional Requirements (and other information). Only about a third of those inquiring have responded by filing information about their activities. In fairness to the inquiring institutions it should be said that, judging from their names, a number are short-course vocational institutions that fall outside the Commission's scope, and in several cases information was requested for use in assessing whether to organize a new institution.

b. Unless the staff analysis shows a prima facie case that the institution meets the General Institutional Requirements no further formal action is taken, but in many cases institutions seek informal staff counsel in revising their activities and materials.

Of the 39 institutions that have submitted information, 16 have been found to make this prima facie case. The other 23 have been requested to provide further information, or have been advised that unless changes are made in their operations they do not appear to meet the Requirements.

c. Following staff acceptance of the written submission, the institution is advised to proceed with a self-study, and assistance is given in this process.

Of the 16 institutions receiving staff acceptance, 10 have submitted self-study documents, and 6 are in the process of self-study.

d. Following receipt of the self-study document, which constitutes the formal application for consideration, the Commission's evaluation process, including a site visit by a team, is scheduled.

Of the 10 institutions submitting self-study documents (and thereby formally applying for affiliation), 5 have site visits scheduled after March 1, 1983. Actions have been taken on the remaining 5 as follows:

One was granted accreditation (this is a long-established public vocational-technical school that had not previously sought North Central affiliation);

Two were granted candidacy;

One was denied candidacy;

One withdrew its application following the site visit and review, but before final Commission consideration.

e. The common path to accreditation is for the institution first to seek candidacy, a formal status of affiliation with North Central. An institution can be in candidacy for six years; candidate institutions are evaluated through a site visit every two years. Institutional development during the candidacy years points to accreditation, and in general a candidate institution successfully attains accreditation.

Of the 14 institutions granted accreditation during the past year, 8 moved to accreditation from candidacy; the 6 granted accreditation without candidacy were all long-established institutions (four of them theological seminaries) that had not previously sought North Central affiliation. 6 candidate institutions that applied for accreditation were denied accreditation but had candidacy continued. Under Commission policy an institution can withdraw an application for accreditation or candidacy without prejudice at any time before the final decision; some candidate institutions that originally sought accreditation withdrew the application in the course of the process and successfully sought continuation of candidacy. 10 institutions were granted candidacy. (Note: these numbers differ from those in paragraph d. above because actions enumerated here include institutions making application before March 1, 1982.)

f. During the past year the Commission has withdrawn accreditation from one institution on probation (which then ceased operations), and has withdrawn candidacy from one institution (which is in the process of appealing from this decision). One institution, which had been placed on probation, merged with a strong institution. The Commission seeks to counsel institutions in difficult circumstances to find additional resources, merge, or cease operations before conditions have deteriorated to the point at which accreditation or candidacy will be withdrawn.

AICS

Accrediting Commission

Association of Independent Colleges and Schools 1730 M Street, N.W. Washington, D.C. 20036 (202) 659-2460

March 7, 1983

The Honorable Paul Simon
U.S. House of Representatives
320 Cannon House Office Building
Washington, D.C. 20515

Dear Congressman Simon:

This is in response to your letter of February 23, 1983, inviting answers to three specific questions, with the responses to be included in the record of the hearing held before the Subcommittee on Postsecondary Education on February 10, 1983. We are happy to respond.

Please note for your files that your letter was sent to the wrong association and the wrong address and was delayed in reaching our office, which is as indicated on this letterhead.

1. The AICS accrediting process involves a continuous monitoring of the fiscal stability of an institution. An annual "accounting-type" financial report is required filing. The information submitted is computerized and the data are analyzed. The data are then compared to similar data from the institution for previous years. If the potential for fiscal instability shows up, the institution then is required to submit quarterly financial statements and the monitoring intensifies until the institution either recovers its stability or has its accreditation withdrawn for fiscal instability.

   I would like to point out that your reference to "default rates on student loans" is rather broad and seems to imply an institutional responsibility for the collection of all "student loans." This is not the case. For the most part, AICS accredited institutions participate in two loan programs, the NDSL program and the GSL program. While there is an institutional responsiblity in the collection of NDSL's, the same is not true for GSL's, the collection of which is out of the hands of the participating institution.

Default rates on student loans are only one of many factors that affect the overall financial stability of an institution. I cannot recall an institution ever losing its accreditation solely based on the default factor -- except as that factor, perhaps with others, reflects the administrative capability or educational quality at an institution and which the lack of, in the opinion of the Accrediting Commission, has led to loss of accreditation by numerous institutions.

There is discussion within the Commission at this time about the development of guidelines to aid site evaluators and staff members in better assessing the financial aid management at an institution. It would not be the intent of these guidelines to transform evaluators into auditors, rather to help them identify financial aid administration weaknesses at an institution and to report those weaknesses to the Accrediting Commission.

2. During 1982, a total of 58 institutions were reviewed for initial accreditation. Of these, 36 received accreditation, a percentage of 62. (It is instructive to understand that a high percentage do not achieve accreditation on first attempt, but continue to remedy deficiencies until they are accreditable. An initial applicant institution may be deferred one or more times while remedying deficiencies before accreditation is either granted or denied. This process can take a full 12 months or longer.)

   During 1982, accreditation was removed for various causes from ten institutions. (Several other suspensions issued in 1982 are pending while schools exercise their appeals.)

3. Only those relatively few states that claim to have constitutional responsibility for accrediting should be engaged in a process which duplicates what the accrediting associations

already do. There is an admitted role for states in the licensing or approval of proprietary schools to operate. To protect consumer interests in that area requires far less administrative detail and academic evaluation than does accreditation, however.

As a matter of routine, AICS invites appropriate state officials to be present during site evaluations and to share with the Accrediting Commission any information they wish to about a given institution. State officials, on the other hand, do not routinely notify accrediting bodies of their inspection activities and, generally, it is our experience that only when an institution is in some sort of trouble that results in publicity do state officials feel obligated to be in touch with accrediting organizations.

I trust the foregoing is responsive to your questions and will be helpful to the Congress. Thank you for the opportunity to participate in helping to shape legislation.

Sincerely,

James M. Phillips

James M. Phillips
Executive Director

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QUESTIONS FOR DR. JAMES PHILLIPS

1. DURING YOUR ACCREDITATION AND REVIEW PROCESS, DO YOU EVALUATE THE FISCAL RESPONSIBILITY SHOWN BY INSTITUTIONS SUCH AS DEFAULT RATES ON STUDENT LOANS? DO SCHOOLS EVER LOSE ACCREDITATION FOR THAT REASON?

2. CAN YOU GIVE US A PERCENTAGE ON HOW MANY SCHOOLS THAT APPLY FOR ACCREDITATION RECEIVE IT? HOW MANY SCHOOLS LOSE ACCREDITATION DURING YOUR REVIEW PROCESS?

3. DO YOU FEEL THERE SHOULD BE ANY ROLE FOR THE STATES IN ACCREDITING AND REVIEWING INSTITUTIONS? DOES AICS EVER WORK WITH STATE REVIEWERS AT INSTITUTIONS?

ACCREDITING BUREAU OF HEALTH EDUCATION SCHOOLS
(Formerly Accrediting Bureau Of Medical Laboratory Schools)
Oak Manor Offices • 29089 U. S. 20 West, Elkhart, Indiana 46514-1198
Telephone: AC 219 293-0124

Hugh A. Wessley
Administrator

Joanne Glunkler
Admin. Assistant

Phillip Lewis, Ed.D.
Consultant

Mary Lou Read
Secretary

February 21, 1983

Honorable Paul Simon
Chairman
Subcommittee on Postsecondary Education
House Committee on Education and Labor
320 Cannon House Office Building
Washington, D.C. 20515

Dear Mr. Chairman:

We would like to submit the following information for inclusion in the record of the Subcommittee Hearings of February 8-10, 1983.

The hearings which focused on the Carnegie Foundation Essay, The Control of the Campus, gave inadequate recognition to the functions of specialized accreditation and its basic importance to the fields in which it operates. In addition, the presentations made at the hearings were almost exclusively dissertations from the higher education community and did not truly represent the problems and contributions of the private and proprietary institutions offering occupational education and training for immediate entry level employment and advancement.

Department of Labor statistics indicate that there will be shortages of trained personnel to serve the Allied Health fields for the foreseeable future. Yet, a major resource to alleviate this grave societal need is the private and proprietary schools offering current and updated courses in the essential areas.

These institutions are tax-paying businesses whose success and continuity depend upon their effectiveness and the success of thei graduates in

obtaining employment and becoming self-sustaining members of our society. The many levels and types of training make it possible for those with little or with adequate background to succeed at appropriate levels.

Employees in the health field must assume important responsibilities in their work in hospitals, clinics, doctors' offices and in testing laboratories. It is incumbent on them to know current techniques and practices to safely and efficiently serve the public. Private and proprietary schools are organized to respond quickly and appropriately in making curriculum modifications and to update practices - an activity which is not nearly as effective in the traditional higher education institutions. A basic reason for this advantage is that many of such offerings have specialized accreditation with attendant standards and criteria which are updated continuously as the fields demand.

Since mention of the operation and activities of the Accrediting Bureau of Health Education Schools was not specifically identified in the Carnegie Report and in the hearings, and since this agency has operated nationally to serve its member schools for more than fourteen years, its record should be brought to the attention of persons concerned with the hearings.

ACCREDITING BUREAU OF HEALTH EDUCATION SCHOOLS

ABHES was initially recognized by the U.S. Office of Education as a national accrediting agency in 1969 (just one year after the activities of the Accreditation and Institutional Eligibility Staff commenced operation). The Bureau has received continuing and expanded scope recognition to the present date. In the specialized area, ABHES dedicated its efforts to the development and implementation of standards and guidelines for schools offering education and training for Medical Laboratory Technicians and for Medical Assistants. All during this

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period of some fourteen years and cyclic reassessment and continued recognition of the Bureau, the U.S.O.E. and subsequently the Department of Education extended effective, incisive and appropriate guidance and assistance to ABHES. Their requirements were and are clear and definitive and their decisions have been fair and equitable.

Although ABHES is also recognized by COPA for the two specialized areas in the private and proprietary sectors, this organization is still in a growth and development stage. The Bureau was one of the first agencies to be processed for recognition by COPA and is in a position to assess the organization in a constructive way. Its predecessor organizations NCA and FRACHE were of limited duration and NCA was not kindly disposed toward private and proprietary schools because of its orientation toward higher education perspectives. At present, COPA has two assemblies to represent specialized and institutional accreditation interests. But this does not yet serve their constituent members since some accredit both institutional and specialized. It would be unwarranted at this time to seriously consider that COPA take over the function to determine eligibility of institutions to participate in Federal Programs. The system in place has generally worked very well. What COPA could do is an unknown which we cannot afford to test at a time when COPA is still in a developmental phase.

ABHES has grown to a point where it now has in excess of one hundred schools and programs on its accredited list. Over the years programs have been dropped from the list for non-compliance with essential standards. In no case, however, has there ever been a law suit instituted against the Bureau as a result of the decisions of its commissioners. On the other hand, support from our member schools has been outstanding to encourage expanded scope activities.

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As a result, ABHES was further recognized in June 1982 to accredit institutions offering allied health education in the private and proprietary sectors.

All of our schools and programs are eligible for funding under appropriate Federal programs. As a result, the Bureau's Visitation Teams also assess the financial practices of the applicant schools and programs for soundness and stability. In addition, Annual Reports from the schools are received by the Bureau and are reviewed for continuing compliance with financial and other requirements. In 1982 the GSA conducted audits of the schools of a number of DE-recognized accrediting agencies. ABHES and its member schools received a clean bill-of-health relating to its practices.

The Bureau reviews placement services, employment documentation of graduates, assessment reports of proficiency of graduates from employers, and dropout rates to insure that students are being well trained and are successful in their work. In addition, the Manuals of the Bureau, which contain criteria, guidelines and requirements for accreditation of schools and programs, are revised and disseminated every two years with interim supplements as appropriate. As a result, the practices and procedure employed in our accredited schools are kept current and reflect desirable innovative procedures in the appropriate areas.

It was noted that Secretary Bell mentioned that the Carnegie Report was under study in his Department and that a report with recommendations would be forthcoming at the conclusion of this review. In the event that further hearings are to be scheduled in the future, ABHES would be pleased to prepare a presentation that would equitably represent the case of specialized education, particularly the offering of the private and proprietary schools.

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ADDITIONAL COMMENTS

1. The services of ABHES for private and proprietary schools and programs in the health education field is essential since the Bureau is concerned with and serves their highly-differentiated needs, which are different in many respects to the character of higher education offerings per se.

2. We are at a loss to understand why specialized accreditation was not, in balance, represented at the hearings.

3. The schools we serve prepare graduates for entry level jobs in areas where there are jobs, and the courses are tailored to the requirements of the training objectives - not necessarily to fit into traditional time slots.

4. The Bureau's criteria for accrediting schools and programs are equal to and in many cases more stringent than those implemented in institutions of higher learning.

5. Since accreditation is voluntary, there is no "intrusion on campus." Application for ABHES accreditation must be made at the option and decision of the administration of the school or program.

CONCLUSIONS

1. The Secretary of Education should not use regional accreditation as the basis for eligibility for Federal Programs. Regionals have different criteria which do not and cannot equitably apply to our schools/programs. Some accredit programs "at least one academic year in length." Others specify, "colleges that offer baccalaureate degrees." Another example stresses, "institutions that award bachelor's, masters, or doctor's degrees, and two-year institutions which include in their offerings degrees

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in liberal arts or general studies." And the list goes on. None of these patterns are appropriate for the private and proprietary schools.

2. Recommending that COPA and not the Secretary of Education prepare the list of regional associations is impractical for many reasons including the fact that regionals are not experienced or prepared to assess specialized programs.

3. COPA should not be the place of final appeal between accrediting agencies and their accredited institutions. This would merely further complicate rather than simplify the process. As mentioned earlier, ABHES has been able to resolve any of its problems without recourse to litigation.

4. A thorough hearing of the place and activities of the private and proprietary schools will be revealing and will substantiate the need for recognition of the important contributions of this facet of the educational/ training process.

Sincerely,

Hugh A. Woosley

Hugh A. Woosley
Administrator
for
ABHES Commission

HAW:mlr

CC: Roger D. Barry, Ph.D., ABHES Chairman
Donald J. Bogue, Ph.D., ABHES Vice Chairman
Philip Lewis, Ed.D., ABHES Consultant
Thomas R. Jolly, Esquire, ABHES Legal Counsel
Christina Fleps, Attorney, ABHES Legal Counsel
COPA

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